

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

**NOTE:** *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

**REMARKS**

① Awaiting electronic submittal via software

## MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes ☒ No ☐

If the answer is no, show them what the statement says using a signed manifest.

**NOTE:** *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☒ No ☐ N/A ☒ RMK# ☐

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐

- b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes ☒ No ☐ N/A \_\_\_ RMK# \_\_\_

#### REMARKS

## PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ☒ No ☐ N/A ☐ RMK# 7
  - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ☒ No ☐ N/A ☐ RMK# 1

**NOTE:** *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Emergency equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Emergency systems? Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐



- b. Key parameters for automatic waste feed cut-off systems? Yes ☒ No ☐ N/A ☒ RMK#\_\_\_
- c. Communication or alarm system? Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
- d. Response procedures for fire/explosions? Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
- e. Response to groundwater contamination incidents? Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
- f. Shutdown procedures? Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes \_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_
10. **Optional:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

**Job Performed**

**Name of Employee**

**Date(s) Trained**

Setup

Dave Hutchinson

**REMARKS**

① Since job changes for some employees the pre-make ready team sometimes did not have the training 4 in a year. Specifically D. Hutchinson did men training.

② Have 2 different programs exp & staff

## CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]*

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ☒ No ☐ N/A ☐ RMK# ☐

## EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan*

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_

**NOTE:** *OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.*

REMARKS

## PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Emergency communication device? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Portable fire control, spill control and decon equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Water of adequate volume/pressure? Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ☐ No ☐ N/A ☒ RMK# ☐

## REMARKS

## GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes ☐ No ☒ N/A ☐ RMK# ☐

## SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Are under the control of the operator of the process generating the waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Do not exceed a total of 55 gallons of hazardous waste? *per stream* Yes ☒ No ☐ N/A ☐ RMK# ☐
  - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ☐ No ☐ N/A ☒ RMK# ☐
  - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ☐ No ☐ N/A ☒ RMK# ☐

## USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐ RMK# ☐

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☐ N/A ☐ RMK# ☐
- b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist) Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐ RMK# ☐
8. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes ☒ No ☐ N/A ☐ RMK# ☐

#### PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐ RMK# ☐

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#### REMARKS

① Some weeks were missed due to employee having to take on additional job duties.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Page 14 of 14

3/2002

LQG1.3.2002.wpd

## PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐  
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes ☐ No ☒ N/A ☐ RMK# ☐
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ☐ No ☐ N/A ☒ RMK# ☐

## USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ☐ No ☐ N/A ☒ RMK# ☐
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ☒ No ☐ N/A ☐ RMK# ☐
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. Contained the release? Yes ☐ No ☐ N/A ☒ RMK# ☐
- c. Cleaned up and properly managed the used oil and other materials? Yes ☐ No ☐ N/A ☒ RMK# ☐
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ☐ No ☐ N/A ☒ RMK# ☐
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ☐ No ☒ N/A ☐ RMK# ☐

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_

c. Are the combustion gases from heater vented to the ambient air?

Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes ☒ No ☐ N/A \_\_\_ RMK#\_\_\_

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes \_\_\_ No ☐ N/A \_\_\_ RMK#\_\_\_

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes \_\_\_ No ☐ N/A \_\_\_ RMK#\_\_\_

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes \_\_\_ No ☐ N/A \_\_\_ RMK#\_\_\_

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes \_\_\_ No ☐ N/A \_\_\_ RMK#\_\_\_

#### REMARKS





**Jefferson Smurfit Corp (U.S.)**  
DI-NA-CAL® Label Group Norwood Plant

Smurfit - Stone  
Di Na Cal  
Label Group  
Beech St - Cincinnati

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OHIO EPA

APR 26 2002

SOUTHWEST DISTRICT

April 25, 2002

Debora Depweg

Environmental Specialist

OEPA, Div. Of Hazardous Waste  
Management. Southwest District Office

401 East Fifth Street

Dayton, OH 45402-2911

Airborne Express

6901002091

RE: Jefferson Smurfit Corporation (U.S.), DI-NA-CAL Label Group  
Norwood Plant, Norwood, Ohio. EPA Generator ID#OHD056487101

Ms. Depweg

Thank you for coming out and spending time with us to discuss our process. We have received your inspection report from your April 10, 2002 visit to our facility.

While we had a violation of the management of containers, and we immediately corrected the problem, we reinforced the management of the containers during our April 11<sup>th</sup> and 12<sup>th</sup>, 2002 RCRA training classes.

Our annual review of personnel training was accomplished on April 11 and 12. We made sure that key personnel were present during the training. Additionally, David Hutchinson was also trained during this time.

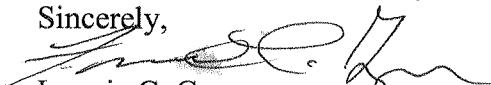
For the hazardous waste storage weekly inspection, we have changed our process and added two additional persons as a backup to Mr. Lerman, who currently performs the weekly inspections. This process was necessary so that the weekly inspection would not be inadvertently missed.

We will submit the hazardous waste report as soon as the software program becomes available.

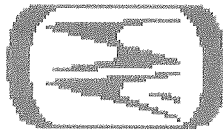
We have also added RCRA refresher training to our Job Skills Review program for the Pre-Make Ready Utility position. This will insure that employees who are transferred to this position receive the proper training.

We wish to thank you for your positive comments that were made regarding our pollution prevention activities and our RCRA training for supervisors. If you have any questions, please feel free to contact Lonnie C. Grayson at (513) 396-5627.

Sincerely,

  
Lonnie C. Grayson,  
Division Plant Engineer.

Cc: T.Skiba, B. Ballman, A. Chiaruttini



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OHIO EPA

APR 19 2002

**Jefferson Smurfit Corp (U.S.)**  
**DI-NA-CAL® Label Group Norwood Plant** SOUTHWEST DISTRICT

April 18, 2002

Debora Depweg  
Environmental Specialist  
OEPA, Div. Of Hazardous Waste  
Management. Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402-2911

cc: T.Skiba; B. Ballman

Airborne Express  
6901004294

RE: Jefferson Smurfit Corporation (U.S.), DI-NA-CAL Label Group  
Norwood Plant, Norwood, Ohio  
Ohio EPA Facility ID: 14-31-37-0116, EPA ID#OHD056487101

Ms. Depweg

Enclosed are the following items:

- The training material that was used during our recent RCRA training program at our plant.
- Sign in sheet for the training.
- Copy of the facility Integrated Contingency Program.

If you have any questions, please feel free to contact Lonnie C. Grayson at (513) 396-5627.

Sincerely,

Lonnie C. Grayson  
Division Plant Engineer

MAIN TOPIC: RCRA, ICP

OTHER TOPIC: Safety plan, recent drill review.

DI-NA-CAL Label Group Norwood Plant certifies that the following signed employees have received training in the above

mentioned program(s) at the below listed date.

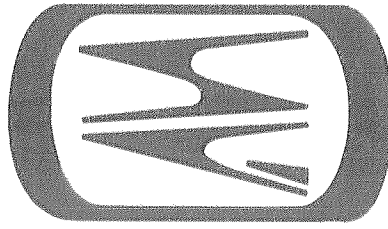
DATE: April 11-12, 2002

Anderson	Jenny	Jenny Anderson
Ashorn	Robert	Robert Ashorn
Baker	Robert	Robert Baker
Ballman	Brian	
Bauer	Gary	Gary Bauer
Binkley	Donna	Donna Binkley
Borgemenke	Daniel	Daniel Borgemenke
Brown	Tamara	Tammy Brown
Burton	Samuel	
Burwick	Daniel	Dan Burwick
Byrd	Danny	Danny Byrd
Campbell	Leonard	
Chadwell	Connie	Connie Chadwell
Check	Carolyn	Carolyn Check
Coffey	Steven	
Colson	Gary	Gary W. Colson
Conley	UPU# 102 Scott	Scott Conley
Conner	Lanna	Lanna Conner
Cook	Dallas	Dallas Cook
Cook	Melanie	
Cooper	Douglas	Doug Cooper
Cooper	Philip	Philip Cooper
Crotty	Lisa	Lisa Crotty
Crump	Chryll	Chryll Crump
Cunningham	John	John Cunningham
Dennis	Marty	Marty Dennis
Downey	Robert	Robert Downey
Edrington	Wanda	
Ense	Bruce	Bruce Ense
Ferguson	James	Jim Ferguson
Flischel	Michael	Michael Flischel
Foley	Michael	Michael Foley
Freeman	Susan	Susan Freeman
Frey	John	John Frey
Fuller	Kenneth	Kenneth L. Fuller Jr.
Gaffney	John	
Glancy	Frank	Frank Glancy
Glaser	Marilynn	
Grayson	Lonnie	

Grohs	Carl	Carl G
Harper	Donna	Donna J. Harper
Haverland	Sharon	Sharon Haverland
Herbe	Dave	Dave Herbe
Higgs	Tina	
Hines	Donald	
Hipp	Steven	Steven Hipp
Hutchinson	David	Mr. David Hutchinson
Jacobs	Glenn	Glenn Jacobs
Kessler	Leonard	Leonard Kessler
Kimble	Gregory	Gregory W. Kimble
Kirn	Mark	Mark Kirn
Kisker	Dave	Dave Kisker
Knepper Jr.	Richard	Richard Knepper
Laflin	William	
Lerman	Rick	Rick Lerman
Liebert	John	John Liebert
Martin	Ruth	Ruth Martin
Mattson	Patricia	
McCulley	Diana	
McKoy	Butch	
McWilliams	Marnike	Marnike McWilliams
McWilliams	Luther	Luther McWilliams
Mills	Daniel	Daniel J. Mills
Mourer	Bill	
Myrick	Michael	Michael Myrick
Ogden	William	
Olgee	Tom	
Painter	J.Dave	J.Dave Painter
Patterson	Yvonne	
Patton	Carolyn	Carolyn Patton
Reynolds	Oscar	Oscar Reynolds
Reynolds	William	William Reynolds
Rogers	Carl	Carl Rogers
Rogers	Teresa	
Rolfes	Thomas	Thomas Rolfes
Ruggles	June	June Ruggles
Scott	Jackie	Jackie Scott
Sensel	Robert	Robert Sensel
Shanks	Andre	Andre Shanks
Skiba	Terry	Terry Skiba
Smith	Joshua	Joshua Smith
Stevens	George	George Stevens
Stockwell	Amie	
Sunderhaus	Andrew	Andrew Sunderhaus
Swisher	Jim	Jim Swisher
Throckmorton	Larry	

Thurmond	Rodney	Rodney Thurmond
Urlage	Judy	
Van Bever	Mo	M.O. Van Bever
Von Hagel	Tom	Tom Von Hagel
Voorhees	Don	Don Voorhees
Wade	Harold	Phil Wade
Wagner	Robert	
Wainscott	Sandy	Sandra L. Wainscott
Walker	James	
Wall	Debby	Deborah Wall
Wall	Robert	Robert Wall Jr.
Walley	William	William Walley
Walters	Daniel	Dan Walters
Wiehoff	Gregory	Gregory E. Wiehoff
Wilcox	John	John Wilcox
Williams	Cynthia	
Wood	Benjamin	Benjamin Wood
Woodrum	Ron	Ron Woodrum
Woster	Fatima	Fatima Woster
Yee	Iggy	Iggy Yee
Yelton	Karen	
Yorio	Matt	
Zutterling	Sandy	Sandy Zutterling

Strebe FLOYD  
Harris Gertha Gertha Harris



# **INTEGRATED CONTINGENCY PLAN**

Hazardous Materials Program

Hazardous Waste Contingency Plan

**Jefferson Smurfit Corporation (U.S.)**

**DI-NA-CAL NORWOOD**

**Norwood, OH**

Last Revised: April 02

## **Table of Contents**

<b>Section 1. Plan Introduction</b>	<b>Page 1</b>
1. Purpose And Scope of this Plan	
2. Description of Site Activities	
3. Corporate Regulatory Commitment	
4. General Facility Identification Information	
5. Description of Plant Emergency Organization and Roles (PEO)	
<b>Plant Emergency Organization Chart</b>	<b>Page 7</b>
<b>Section 2. Core Plan Elements</b>	<b>Page 9</b>
1. Discovery	
Procedure for Contacting Emergency Coordinator	
Requested Information When Reporting An Emergency	
2. Initial Response to Emergency	
3. Sustained Actions	
4. Termination and Follow-up Actions	
<b>Section 3. Standard Procedures for Responding to Plant Emergencies</b>	<b>Page 11</b>
<b>Summary of Basic Response Procedures</b>	
1. <b>Chemical Spill Emergency</b>	<b>Page 11</b>
2. <b>Fire or Explosion Emergency</b>	<b>Page 13</b>
3. <b>Evacuation</b>	<b>Page 14</b>
Building Evacuation	
Work Place Evacuation	
4. <b>Health Emergency</b>	<b>Page 15</b>
5. <b>Mechanical System Emergency</b>	<b>Page 15</b>
<b>Section 4. Description of Emergency Equipment</b>	<b>Page 16</b>
1. Personal Protection Equipment	
2. Fire-Fighting and first Aid	
3. Specific Equipment in Hazardous Waste Storage Area	
4. General Equipment	
5. Chemical Emergency Monitoring Equipment	
6. Spill Control Kits	
7. Additional Spill Response Equipment	
8. Responsibility for Emergency Equipment	
<b>Section 5. Administration and Training</b>	<b>Page 18</b>
1. Employee and Contractor Training	
2. Filing an Incident and Accident Report	
3. Interaction with City of Norwood Fire Department, LEPC, and Medical Professionals	
4. Prevention Efforts	
5. Program Evaluation	

# DI-NA-CAL Norwood Integrated Contingency Plan

## SECTION ONE-- PLAN INTRODUCTION

### 1. Purpose and Scope of this Plan

The purpose of this Integrated Contingency Plan (ICP) is to provide a planned, coordinated response procedure for each "conceivable" plant emergency including emergencies concerned with hazardous waste spills. Since most employees are limited in the emergencies they may respond to, DI-NA-CAL Norwood has developed a Plant Emergency Organization (PEO). The purpose of the PEO is to assist and aid employees during emergencies, preserve the integrity of equipment and utility systems, reduce overall property loss, and protect the environment.

*The Plant Emergency Organization (PEO) is designed to ensure that all shifts have responsible, trained employees available to assist in emergencies. A discussion of each PEO position is provided below. A current PEO Organization Chart is shown on Page 7 of this written Plan. Additional information about the PEO and employee roles in emergencies can be found in **Annex 3**. A table of contents can be found in the front of this Plan. The Annexes (appendices) can be found in the back.*

While the PEO is critical in emergencies, all employees and contractors must be trained on and familiar with general plant emergency procedures. This written Plan is designed to explain to employees what the standard emergency responses are for this plant. Employees will also learn about the equipment, tools, and practices used to help protect them, such as emergency equipment and spill control devices. The Plan also explains communication, notification, and the chain-of-command used during emergencies.

Another purpose of the ICP is to meet the requirements of 40 CFR 265, (RCRA - Hazardous Waste), along with any State Regulations that may accompany or supplement the federal regulations. The Integrated Contingency Plan details the emergency response procedures that will be followed in the event of any plant emergency, including emergencies involving hazardous waste spills in storage areas. The following section contains more detailed information related specifically to the hazardous wastes generated at the plant.

### 2. Description of Site Activities

In the printing of heat-set labels, inks, solvents, lacquers, primers and coatings are used throughout the process. Solvents are stored in bulk form in four (4) 5,000-gallon underground storage tanks located outside behind the plant building, as well as in drums and pails in the ink & solvent storage areas. Lacquers, primers and coatings are also stored in drums in these areas. Point-of-use containers containing these materials are stored in the pressroom in minimum quantities as



required for production. Totes are also used to store varnishes. These are stored in the first floor ink vault.

Hazardous wastes generated during the production process include waste solvents, and solid absorbent materials used during press cleanup and general cleaning in the pressroom.

The primary hazard associated with the hazardous wastes generated at this site is flammability or ignitability, resulting from the low flash point of the solvents. The associated hazardous waste codes assigned to these types of waste are D001, D035, F003, and F005. These waste codes reflect the ignitability of the solvent constituents present in the waste generated by the printing process.

The DI-NA-CAL Norwood facility is a large quantity generator (LQG) of hazardous waste. Waste material is accumulated in 55-gallon drums, stored less than 90 days, and is customarily shipped to two hazardous waste treatment and disposal facilities operated by Rinco Chemical or Petra-Chemical Processing Inc. There may be up to 100 drums of Hazardous Waste or "Recyclables" in temporary storage at any time.

Hazardous waste is stored in the hazardous waste storage room and the ink vault located on the first floor of the plant. Refer to the facility map/chemical locator map in **Annex 1** for the exact locations. The hazardous waste storage areas are formally inspected on a weekly basis to ensure there are no leaking drums, that drums remain in good condition, and to verify that there is no storage or security problems while the drums await pick-up and disposal. It is plant policy that floor drains in process and storage areas shall be removed. Through renovations nearly all floor drains have been removed. The final few floor drains are scheduled for removal.

The hazardous waste storage areas are enclosed within the plant building and the area is equipped with adequate fire protection, security, and a telephone. The hazardous waste storage area is equipped with curbing to provide spill containment and prevent any releases from leaving the immediate area until spill cleanup measures are performed.

### **3. Corporate Regulatory Commitment**

The Jefferson Smurfit Corporation, Consumer Packaging Division, DI-NA-CAL Norwood Plant #454 is firmly committed to providing each employee a safe and healthy work environment. A safe work environment is a component of corporate policy as well as an important regulatory requirement under the Occupational Safety and Health Act (OSHA). In order to provide a safe work environment, OSHA requires certain steps to be taken to provide for employees during emergencies.

The Environmental Protection Agency is responsible for keeping the environment safe. Therefore, the EPA requires DI-NA-CAL Norwood to manage its chemicals, wastes, and any spills that may result from handling and using these materials. Furthermore, other governing bodies like the City of Norwood require this plant to have specific procedures for handling emergencies as well. As a result, an Integrated Contingency Plan has been created to cover the regulatory requirements pertaining to plant emergencies, including chemical spills. Specific regulatory citations such as 29 CFR 1910.38 and 40 CFR 265 addressed by this Plan can be found in **Annex 8.**

In response to the above regulatory requirements and corporate policy, the Environmental Health and Safety Manager (EH & S Manager) will work closely with Area Supervisors to train all affected employees on emergencies in this plant, and any other information that pertain to work place environment, health, and safety. **An employee can obtain a copy of this Plan from the Area Supervisor or the EH & S Manager.** This program should be reviewed annually or if any changes occur in the plant or its processes. Plan amendments can be found in **Annex 6.**

#### **4. General Facility Identification Information**

The Jefferson-Smurfit Corporation is based in Clayton, Missouri but operates DI-NA-CAL Norwood Plant #454 in Cincinnati, Ohio (Norwood). DI-NA-CAL Norwood is in the business of rotogravure printing using paper, foil, and heat transfer labels applied to consumer packaging containers. These printing processes involve the use of inks, lacquers, primers, and coatings. The fact that there are solvents and other hazardous materials used on-site during press operations, means related hazards of such operations must be discussed with employees, including related emergency procedures. **LINK-- the Hazard Communications Program further discusses workplace hazards, as well as chemicals present in this plant and their related hazards.**

#### **FACILITY INFORMATION**

Jefferson Smurfit Corporation, Consumer Packaging Division

DI-NA-CAL Norwood/Plant #454

Physical/Mailing Address      4500 Beech Street  
Cincinnati, Ohio 45212  
County of:                      Hamilton

Longitude/Latitude:  
84° 27' 30"N/ 39° 9' 0"W

Facility Main Phone Number: (513) 396-5600  
24-Hour Emergency Number: (513) 396-5666

Fax Number: (513) 396-5615

E-Mail: TSkiba@smurfit.com

EPA 1431370116

SIC: 2754

**Key Contact: Plant Manager, Mr. Dave Kisker pager # (513)383-5857**

Emergency Response Vendor:  
Clean Harbors, Mr. Mike Janna at 1-800-645-8265

**IMPORTANT NOTE:** A facility map can be found in **Annex 1**

## **5. DESCRIPTION OF PLANT EMERGENCY ORGANIZATION (PEO)**

The purpose of the PEO is to assist and aid employees during emergencies, preserve the integrity of equipment and utility systems, reduce overall property loss, and protect the environment. In emergencies, the Emergency Coordinator (EC) can activate the PEO Squads by calling or paging key members. When members of the PEO are summoned they take instructions from the EC. The PEO Squads can be utilized to respond to any emergency. The basic roles and responsibilities of the PEO squad members are discussed below. More information can be found in **Annex 3** of this written Plan.

### **Responsibility**

The Emergency Coordinator is responsible for coordinating all emergency situations, including instituting the appropriate phases of the Integrated Contingency Plan when notified of:

- a. Fire or explosion in the plant or yard.
- b. Spillage of hazardous materials or hazardous waste in the plant or yard.
- c. Any other hazardous waste incident the EC deems appropriate.

### **PEO Roles**

#### **COMAND AND COMMUNICATION**

##### **Emergency Coordinator (Person In Charge or Incident Commander)**

- Has full responsibility and command until Fire Department arrives
- Decides if employees should be evacuated -- gives verbal command
- Directs Notifier, EC Runner, Fire Squad, Fire Extinguisher Gatherers, Salvage, Sprinkler Control and Plumbers/Electricians
- Coordinates all activities with the Norwood Fire Department and other regulating agencies who might respond
- Decides when the building can be safely re-entered and employees can return to their work areas and begin operations again.
- The EC is in charge of overseeing waste disposal and completing the incident/accident form.
- The EC is also responsible for all official communication including reports to regulators, statements to the media, interactions with emergency responders, and the fire department. A notification list can be found in **Annex 2**.

**Notifier**

- The EC will direct the Notifier to personally call the fire department and/or police, and any other regulating agency specified by the EC or Fire Chief
- The EC may use the Notifier for all outside communications during emergencies

**EC Runner**

- The key role for the EC Runner is to provide employee/departmental roll call information to the EC after an evacuation or shelter-in-place incident
- The EC may direct the EC Runner to assist in any search and rescue procedures, or other tasks related to attendance

**PLANT EMERGENCY SQUADS**

**Fire Squad--** Locate and control fire to the degree possible

The Fire Squad can respond to incipient fires (those that have just begun). The members are trained on hose lines no larger than 1 1/2" in enclosed structures, and hand-held extinguishers. Members are drilled annually (OSHA Subpart L). Squad members can also provide defensive fire fighting until the fire department arrives, as long as a clear exit route exists. Duties include:

- Ensure all employees are removed from Area
- Cut-off electrical or process equipment in Area
- Securely cover and remove containers of flammables from Area
- Begin fire fighting with hand-held extinguishers as soon as possible
- Operate any fire pump or act as fire hose operator(s)

**Salvage--** To minimize damage to property and injury to employees

- May assist the EC Runner/Fire Department in searching the plant to ensure all employees have been evacuated
- Begin restoration and salvage operations as soon as possible, and attempt to get systems restored to normal operation
- Salvage all useful materials
- May recruit additional employees to assist

**Sprinkler Control (Accidental Activation or Actual Fire)**

- Any employee discovering an activated sprinkler should call the Area Supervisor immediately
- Only the EC, PEO, and Area Supervisors are allowed to take action steps to control sprinkler discharge
- Assists Plumber in ensuring the operation and turning-off of sprinklers

**Plumber (Piper)**

- Knowledgeable about plant gas, steam, water, flammable liquids and air piping system

- Must be prepared to shut-off any or all systems
- After any emergency involving the sprinklers, the piper will replace all fused sprinkler heads as soon as possible

**Electrician**

- Knowledgeable about shut-off of power and ventilation to the plant
- Bring on-line auxiliary power systems
- Secure, control, and correct electrical hazards
- Ensure electric power to any response equipment

## 2001 PLANT EMERGENCY ORGANIZATION CHART

If the primary coordinators are unavailable then the alternate coordinators are paged. In the event of an emergency during off-hours when no Coordinator or Area Supervisors are present, employees shall call Security immediately by dialing the main #396-5666 and any extension number.

### Primary Emergency Coordinators

1. **Dave Kisker** pager #308-6716 cell phone # (513)383-5857
2. Lonnie Grayson cell # 383-7703
3. Terry Skiba pager # 308-8245
4. Brian Ballman cell # 383-5858

**All emergencies must be promptly reported to EH & S Manager, Lonnie Grayson at cellular phone # (513) 383-7703**

### Corporate Environmental Affairs Emergency Primary Contact

(Please contact the below listed numbers in the order given)

Al Chiaruttini, Manager Office 610-935-4006  
Environmental Services

### Secondary Contacts

Curtis Barton, Director Office 770-621-6707  
Environmental Affairs Sect's 770-621-6712 (April Tugman)  
Fax 770-621-6733

Nina Butler, Env. Counsel Office 770-621-6741  
Smurfit-Stone Container Corporation Sect's 770-621-6705  
Fax 770-621-6733

Roy Cobb, Env. Counsel Office 314-746-1154  
Smurfit-Stone Container Corporation Sect's 314-746-1144  
Fax 314-746-1333

**Important Note: For a complete notification list, please see Annex 2.**

**Notifier**                      On-Call

**EC Runner**                      On Call

**PLANT EMERGENCY TEAMS**

**FIRE EMERGENCIES (Supervisors are trained in basic first aid and CPR)**

	<b>First Shift</b>	<b>Second Shift</b>	<b>Third Shift</b>	<b>Weekend</b>
<b>Fire Chief</b>	L.Conner Supervisor	S. Wainscott Supervisor	S. Coffey Supervisor	S.Wainscott B. McKoy
<b>Fire Squad Leader</b>	On call	On call	On call	On call
<b>Alternate</b>	On Call	On call	On call	On call
<b>Salvage Squad</b>	R. Lerman	On call	On call	On call
<b>Sprinkler Control</b>	On Call On Call	On Call On Call	On Call On call	On call On call

**MECHANICAL SYSTEMS EMERGENCIES**

<b>Plumber and Electrician</b>	O. Reynolds J. Painter	On Call On Call	G. Colson S. Burton	On call On call
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## **SECTION TWO-- CORE PLAN ELEMENTS**

### **1. Discovery**

Discovery addresses the initial actions of the employee discovering an emergency incident, what steps the employee will take to assess the problem, and procedures for calling for help.

#### **Procedure for Contacting the Emergency Coordinator/PEO**

*In any emergency, the employee will notify the Area Supervisor immediately.*

Then, the Area Supervisor will call or page any additional Emergency Coordinators (EC). On second and third shift, the Area Supervisor, may be the Emergency Coordinator. Depending on the severity of the incident, the EC may determine the incident is indeed an emergency. At this point, the EC may elect to call or page one or all of the alternate coordinators, and call the PEO Squad members to assist. The EC or Alternate Coordinator is in charge of the incident until the emergency is over or fire department arrives and takes command and control.

#### **Requested Information When Reporting an Emergency**

The following information is needed to help assess a potential emergency:

- Call Area Supervisor personally or using a "buddy"
- State Name and Location in Plant
- Give Description of Incident (i.e. fire, chemical spill etc...)
- Report Spill Quantities of Materials, Affected Areas, Employees Involved
- Report Injuries or need for first aid

### **2. Initial Response to Emergency/Spill**

After discovering the incident and reporting it to the Area Supervisor, process employees may take steps to control the situation. The Area Supervisor, at the direction of the EC, may begin evacuation procedures. Employees who are not trained on PEO procedures such as chemical spill control, or fire-control techniques must leave the affected area, as directed by the Area Supervisor or EC. If needed, the EC will request additional assistance from an outside agency.

### **3. Sustained Actions**

If the emergency can be easily handled by process employees, then these employees will continue to address the incident until it has been mitigated. If the emergency incident IS NOT controllable, then the EC will take control and direct process employees and/or PEO Squads as long as necessary, and/or call in the fire department or the outside emergency response vendor.

### **4. Termination and Follow-up Actions**

The EC (or Alternate EC) is in charge of declaring the emergency to be over.

- The EC will determine when it is safe for employees to return to their work areas and begin operations again.



- The EC is in charge of overseeing waste disposal, restoring emergency equipment supplies, and completing the incident/accident form. This Form can be found in **Annex 4**.
- The EC is also responsible for all official communication including reports to regulators, media statements, interactions with emergency responders, and the fire department.

## **SECTION 3-- STANDARD PROCEDURES FOR RESPONDING TO PLANT EMERGENCIES**

At DI-NA-CAL Norwood, the two most likely emergencies are the potential for a chemical spill and/or fire. However, other emergencies such as severe weather may arise so five general emergency response procedures have been developed. The procedures for the emergency scenarios are discussed below. They are:

- **chemical spill**
- **fire or explosion**
- **evacuation procedures (includes severe weather)**
- **health emergency**

### **Summary of Basic Response Procedures**

Any employee discovering a release of hazardous chemical that is not easily controllable with the available equipment must contact the Area Supervisor immediately. The Area Supervisor will decide to call the Emergency Coordinator (EC ). The EC will decide what additional steps are needed, including calling in the PEO.

After initial notification, all employees not involved in the emergency or spill clean up will be moved out of the area at the direction of the Area Supervisor or the EC. Employees will assemble at their assigned collection points (either inside or outside of building based on the emergency type).

Once assembled, the Area Supervisor will take roll call and report to the EC. The EC will assess the situation further, and determine if the fire department or other regulating agencies need to be contacted. Again, the EC or the Notifier alone will contact all emergency responders /regulating agencies.

### **1. Chemical Spill Emergency**

Most chemicals can be found in process areas, storage areas, and the dock. Smaller amounts may be found in the maintenance. However, these materials get handled and moved around the plant, which means spills can occur. Most often, spills occur in the Press Areas, but they can occur elsewhere. For this reason, there are general spill procedures for Process Area employees. To help employees understand where chemicals are located, a Chemical Locator Map can be found in **Annex 1** of this written Plan.

## Spill Control Procedures

The following spill procedures apply to hazardous materials or hazardous waste in the process areas, maintenance areas, and loading dock. As outlined above, only trained employees are permitted to control or clean-up spills of hazardous materials. The procedures given here are spill control procedures. **LINK-- Specific job duties and activities related to hazardous waste and its' management are outline in the Hazardous Waste Management Program, in Appendix G-- Job Descriptions.**

- Notification-- the first step in a spill emergency is to isolate the involved area by removing employees, and if needed, position other employees at entrances to prevent any entry to spill area. If possible, process employees should also attempt to cover any open drains using the magnetic drain covers. The second step for the employee or buddy is to notify the Area Supervisor, who will then notify the EC if needed. The EC will help the Area Supervisor assess the situation and decide on an appropriate response.
- Containment and Control-- the third step is to collect spill clean-up materials and equipment (a buddy could help with this). Put on or "don" all types of PPE. In certain cases, where circulation is poor or the area is enclosed, respiratory protection might be needed, and the Area Supervisor or Foreman may request employees wear respiratory protection. The fourth step is to implement other spill control and other containment procedures as quickly as possible, like covering or barricade spills and drains using the magnetic drain covers and various absorbent material. If a fire is involved in a spill emergency, where possible process employees will disconnect electrically-powered equipment, remove flammable materials, and use hand-held foam or other fire extinguishers to minimize the effects of a fire, until back-up help has arrived. All used absorbent materials will be placed in DOT-approved drums and labeled as hazardous waste, in addition to managing any liquid wastes generated from fire fighting activities.
- Follow-up Actions-- the fifth step involves the EC who will aid and help coordinate employees for the collection and management of hazardous wastes, until the time when those wastes are removed for disposal. **All hazardous wastes shall be stored in the Hazardous Waste Storage Room/Ink Vault.** The EC will also ensure that all emergency equipment and spill control cabinets are restored to fully operational status. The Gravure Foreman will assist the EC in this task. The sixth step includes the EC, assisted by two other qualified persons, who will investigate the cause of the emergency, review and critique the incident to determine if changes in operating procedures or best management practices are required. Qualified persons usually include Area Supervisors and/or the EH & S Manager.

- Incident Closure-- prior to allowing work to resume in the affected area, the EC will ensure that the emergency has been eliminated, and that the clean up has progressed to the point where employee health and safety will not be affected. Then, the EC will allow employees to return to the work area. Once the emergency has been reviewed, the EC will file the final reports. The EC will also make any necessary calls to the regulating agencies.

## **2. Fire or Explosion Emergency**

In the event of any fire or explosion, an employee or "buddy" shall immediately notify the Area Supervisor, who will then call the EC if needed. A trained employee may undertake defensive fire fighting, but must retreat if fire becomes too large. Employees shall alert the Area Supervisor and Emergency Coordinator if any fire extinguishers have been discharged. Discharged extinguishers should be tagged out, and re-charged and replaced as soon as possible by the EC (or Area Supervisor). All fires and explosions, regardless of size, require an incident/accident form to be completed

### **Basic Fire-Fighting Techniques (FIRST FEW MINUTES ARE CRITICAL!)**

- Notify Others-- Give Loud Verbal Warning-- Fire! Fire!
- Employee/Buddy Must Notify Area Supervisor (sound the plant alarm system)
- Employees Close Doors To Affected Area (after ensuring all employees are out of the affected area(s))
- Gather Extinguishers and Fire Fighting Tools
- Area Supervisor or EC will begin calling for fire department/PEO members
- Shoot and Sweep Hand-held Extinguishers Across Base of Fire
- Activate wall and support mounted fire hoses/foam producing equipment
- If EC or AS calls 911/Fire Department, one designated employee will assist the FD is locating the plant and the fire location (stand watch in front of plant)
- If possible, Continue Fighting Fire w/ Extinguisher Until Fire Completely Out
- Confirmation by EC, Fire Department, or Area Supervisor

Silco is the vendor who tests and maintains all CO2 systems and hand-held fire extinguishers on-site.

## **3. EVACUATION**

### **BUILDING Evacuation Procedure and Plan**

This procedure covers emergencies involving fires, earthquakes, or large chemical spills that require evacuating the building.

**Alarm Code:** The plant alarm signal will signal in the event of a fire. In the event of a chemical spill or an earthquake, the EC or supervisor will give the alarm signal for employees to exit the building.

**Assembly Areas:** Each work area has a primary evacuation route, but employees should not hesitate to use an alternate route, if the primary route is blocked. Evacuation route maps are posted by exit and doors. Actual routes are shown in Annex 1 of this Plan. Upon leaving the building, employees must collect in their designated areas to be accounted for during roll call. No one may leave the collection point without authorization from the Area Supervisor or EC. EMPLOYEES MUST USE EVACUATION ROUTE AND COLLECTION POINT CLOSEST TO WHERE THEY ARE!!! EMPLOYEES SHOULD NOT ATTEMPT TO RETURN TO REGULAR WORK AREA. EXIT AT NEAREST POINT!!!

**During Emergency:** Each Area Supervisor will take roll call for his/her department. The Area Supervisor will select an employee to act as a Runner. The Runner will take the roll call information to the EC or Fire Chief. Only the EC or Fire Chief will implement a search and rescue for any missing employees or contractors.

**Follow-up to Emergency:** An employee acting as a Runner for the EC will notify the Area Supervisor in each collection point, when it is safe to return to building.

#### **WORK AREA Evacuation Procedure and Plan**

This procedure covers a specific type of emergency. The primary concern is severe weather, like a hurricane or tornado. To a lesser degree, we are concerned with chemical spills that occur OUTSIDE the plant, perhaps at a neighboring facility. When these emergencies occur we are required to “shelter-in-place”, which means employees move from work areas to sheltered areas in the building.

**Alarm Code:** EC or Area Supervisor will actuate the alarm signal for employees to exit their work area and go to “shelter-in-place” collection point.

**Assembly Areas:** There are four main assembly areas for employees on the INSIDE of the plant. Evacuation route maps are posted by exit doors. Actual routes are shown in Annex 1 of this Plan. When employees have assembled, roll call will be taken by the Area Supervisor. The inside collection points will be:

- A. Finishing, Maintenance, Dock and Upper Floor Employees—Collect in NW corner of Finishing Dept. next to Dinacal Eng. entrance
- B. Dinacal Engineering-- Hallway between their office area and the shop area outside the parts storage area.
- C. Office Employees-- Collect in hallway outside of the Barco office entrance door
- D. Employees Working on Upper Floors-- Ground Floor in Aisle between Q.C. Lab and the Cylinder Storage Area north of the Lab.

**During Emergency:** No one may leave the collection point without authorization from the Area Supervisor. During a tornado, the best place to be is inside under a large heavy structures. If a tornado threatens to actually touch down nearby or hit the building, employees will get into a squatting position, clasp hands behind their head, and put head down to knees. Each Area Supervisor will take roll call for his/her department. The Area Supervisor will select an employee to act as a Runner. The Runner will take the roll call information to the EC or Fire Chief. Only the EC or Fire Chief will implement a search and rescue for any missing employees or contractors.

**Follow-up to Emergency:** An employee acting as a Runner for the Emergency Coordinator will notify the Area Supervisor in each collection point, when it is safe to return to work areas.

#### **4. Health Emergency**

ALL emergencies, including injury and illness, require employees to contact nearest Area Supervisor for assistance. Certain supervisors and employees are trained on basic first aid and CPR. These employees are on-call by shift and will be contacted by Area Supervisor or Emergency Coordinator. **Only the Area Supervisor or EC should call 911!**

#### **5. Mechanical System Failure**

ALL emergencies, including mechanical system failure, require employees to contact nearest Area Supervisor for assistance. Maintenance employees and certain process employees are trained to assist in these emergencies. During full-scale emergencies the EC or Fire Department may call on PEO members to assist with system shutdown.

### **SECTION FOUR-- DESCRIPTION OF EMERGENCY EQUIPMENT**

The equipment listed below shows the type of equipment and the quantity on-hand at DI-NA-CAL Norwood. In the case of a large-scale emergency, it is possible to "borrow" additional emergency equipment from outside agencies such as the Norwood Fire Department or emergency response vendor. The list below shows what is typically available through the spill stations in the process areas. Certain items must be obtained through the Area Supervisor. Monitoring equipment is kept and maintained by the EH & S Manager.

#### **1. Personal Protection Equipment**

- Level C Respirators (assigned to certain employees only)
- Replacement Cartridges
- Non-encapsulating Tyvek Cover-alls
- Rubber Boots
- Disposable Gloves

Goggles/Shields

## 2. Fire Fighting and First Aid Equipment

Hand Held Fire Extinguishers

<b>Dry Chemical</b>	<b>A,B,C</b>	<b>SIZE</b>	
Halon	A, B, C		8
Water	A		19
CO2	B,C		27

Wheeled Cart Fire Extinguisher

CO2	B,C	12
-----	-----	----

Press Area CO2 Systems

Fire Blankets and Stretchers

## 3. Specific Equipment Located in Hazardous Waste Storage Area

**Wall-mounted spill cabinet**

**1 wheeled CO2 fire extinguisher**

**3 AFFF foam extinguisher (2.5 gal)**

**Communications: 1 telephone**

## 4. General Equipment

Fork Lifts and Pallet Movers

Two Units

## 5. Chemical Emergency Monitoring Equipment

Combustible Gas Meter One Unit

Oxygen Concentration Meters One Unit

## 6. Spill Control Cabinets

DI-NA-CAL Norwood has standard equipment for controlling spills. These materials are found in the Spill Control Cabinets located in process work areas and dock or maintenance. Each Spill Control Cabinets contains the following items:

Absorbent Products-- Pigs, rags, loose absorbents, and absorbent pillows

Barrier Products-- Socks and snakes, soil, sand, Magnetic Drain Covers

PPE Products-- Tyvek suits, gloves, goggles, and duct tape

Non-sparking Tools-- Available from Area Supervisor

## 7. Additional Spill Response Equipment

As noted above, some items like the non-sparking tools are available through the Area Supervisor. The EH & S Manager can provide spare or salvage drums,

containers, hazardous waste and warning labels, as well as Oxygen/LEL monitors. In the event of injuries, there are first aid kits available as well.

#### **8. Responsibility for Emergency Equipment**

It is the responsibility of the EC and the Area Supervisor to ensure that there is sufficient spill control equipment in the spill control cabinets located in the process areas. In total, the EC is required to store enough absorbent materials to absorb and contain a spill of five 55-gallon drums on hand at this site. Specific use of spill equipment is covered in during on-the-job training. As part of our preparedness, DI-NA-CAL Norwood also has access to additional spill supplies and equipment available from the Norwood Fire Department or Clean Harbors during large-scale emergencies. If needed, the EC will make these arrangements.

## **SECTION 6-- ADMINISTRATIVE AND TRAINING REQUIREMENTS**

### **1. Training**

All employees must be trained on basic emergency procedures. Employees must have additional training before they may respond to:

- Chemical Spills
- Fire Emergencies
- Sprinkler Activation
- Injury or Health Emergencies

Under no circumstances should employees respond to emergency situations without additional training. To work in the process areas, in addition to being trained on the material contained in this written Plan, employees are required to be trained annually on one or more of the following **LINKS--**

- **Hazard Communications/Right-to-Know**
- **Hazardous Waste Management and RCRA Requirements**
- **Respiratory Protection**
- **Personal Protective Equipment**
- **Spill Control Practices**
- **Waste Minimization Program**

Additional information about training/drill exercises can be found in **Annex 5.**

### **2. Filing an Incident/Accident Report**

The EC will personally investigate any incident/emergency and complete an Incident/Accident Report Form with two other qualified persons. The completed form shall be given to the EH & S Manager. The completed Form will:

- Identify the cause of the spill or leak;
- Identify any safety procedures that were violated or missing;
- Determine source of the incident, and see if situation was adequately covered by existing emergency procedures;
- Determine if the response effort and supply of materials adequate and appropriate to address the incident;
- Determine if employees were prepared to deal with the emergency, review procedures and determine what new procedures need to be added, and complete a change management form; and
- Assess whether the proper reporting procedures were correctly executed, in a timely fashion.

**IMPORTANT NOTE:** A copy of the incident/accident form can be found in **Annex 4** of this written Plan.

### **3. Interaction with the Norwood Fire Department, Local LEPC and Medical Care Providers**



The following activities are required for the safety of both our plant and any fire responders who might be called to this plant.

- Annual Facility Tour
- Annually Updated Chemical Locator List and Map
- Provide copy of fire protection diagram to Fire Department
- Conduct Mutual Training if requested
- Check to ensure DI-NA-CAL Norwood plant is included in LEPC Planning
- Submit Copies of integrated Contingency Plan to all parties

#### **4. Prevention Programs**

##### **Written Programs**

As noted earlier, the primary concern for emergencies is the potential for chemical spills, or fires from handling and using flammable materials. But, most emergencies can be caught before they even start by practicing prevention techniques. In addition to the prevention techniques listed below, there are other tools and resources to help prevent emergencies, namely, **the Stormwater Pollution Prevention Plan (SWP3)** and SSCC Property Conservation Program. These documents can be found in **Annex 7**.

##### **Common Techniques for Preventing Emergencies**

- Grounding and Bonding Containers holding Flammable Materials
- Keeping Lids securely fastened to containers
- Good Housekeeping Practices like keeping aisle clear and work space neat
- Safe Work Practices like reading MSDS or reviewing operating procedures
- Properly Handling Hazardous Waste and Hazardous Materials
- Automatic CO2 Fire Suppression on Press 4 and 5
- Keeping Process Equipment in Good Working Order
- Annual Factory Mutual Inspections
- Monthly Plant Inspections
- Weekly Inspections
  - spill control equipment/supplies
  - hazardous waste storage areas
- Safety Committee meetings
- Daily, Routine Inspection and Prevention Maintenance
- Supervisor and Employee Training

#### **5. Program Evaluation**

At a minimum, this program shall be reviewed annually, or if changes occur, or if the Plan does not adequately meet an emergency.

## **Annexes**

- Annex 1**      Facility Map  
                 Chemical Locator Map  
                 Chemical Inventory List  
                 Evacuation Route Maps  
                 Fire Protection Diagram
- Annex 2**      Notification List
- Annex 3**      PEO Team Development Guidance Document
- Annex 4**      Incident and Accident Report Form
- Annex 5**      Training Materials, Drills, and Exercises
- Annex 6**      Plan Amendment and Plan Evaluation
- Annex 7**      Stormwater Pollution Prevention Plan (SWP3)  
                 SSSC Property Conservation Program
- Annex 8**      Applicable Regulatory Citation Matrix

**Annex 1-- Facility Map  
Chemical Locator Map  
Chemical Inventory List  
Evacuation Route Maps  
Fire Protection Diagram**

## **Annex 2-- Notification List**

### **Agency Notification List**

1. National Response Center 1-800-424-8802
2. OEPA Emergency Response Team 1-800-282-9378
3. State Emergency Response Commission 1-614-481-7000
4. Local Emergency Response Committee 1-513-821-1092
5. State Fire Marshal 1-614-282-1927
6. Metropolitan Sewer District 1-513- 557-7000
7. Local EPA Greg Howard 946-7721

### **Information Needed By Responding Agency**

1. Name and Telephone Number of Incident Reporter
2. Name and Address of this Facility
3. Time and Type of Incident
4. Identification and Quantity of Material(s) Involved
5. Extent of Any Injuries
6. List of possible Hazards to Human Health and the Environment
7. Results of Role Call After Evacuation

### **Other Emergency Numbers**

Those noted in bold are the phone numbers most frequently called when spills occur, especially those over the Reportable Quantity (RQ).

**Norwood Fire Department 458-4550 or 911**

**Norwood Police Department 458-4550 or 911**

**EPCRA Hotline 1-800-535-0202**

Bethesda Care (First Aid and Testing) 731-3399

Good Sam (Hospital) 872-2409

Emergency Spill Response Vendor

Clean Harbors/Mike Janna 1-800-645-8265

**Releases to drains, surface water, plumbing network/sewer system**

**Metropolitan Sewer District during business hours call 557-7000.**

**After hours call 244-5500 (MSD Plant Manager), but must also call 557-7000 promptly on the next business day!**

**National Response Center 1-800 424-8802 for amounts above RQ**

The EC may also need to submit an incident report to the regulating agencies if:

- Spills larger than the Reportable Quantity (RQ)
- Spills enter floor drains into piping

## **Annex 3-- PEO Team Development Guidance Document**

## **Annex 4-- Incident and Accident Report Form**

## **Annex 5-- Training Materials, Drills, and Exercises**

## **Annex 6-- Plan Amendment and Plan Evaluation**



## **Annex 7-- Stormwater Pollution Prevention Plan SSCC Property Conservation Program**

## **Annex 8-- Applicable Regulatory Citation Matrix**

## **COURSE PURPOSE**

- ❖ To train employees on the practices involved in the safe, legal management of hazardous waste, and the programs that support and control the presence of these materials on this site.

1

## **COURSE REQUIREMENT**

- ❖ DI-NA-CAL Norwood is required to manage their hazardous waste in accordance with RCRA and various federal laws
- ❖ The rules and regulations surrounding these laws, are enforced by the OEPA
- ❖ RCRA was passed because of mismgt.

2

## **COURSE OVERVIEW**

This course is divided into two general sections:

1. Hazardous Waste Management Program
2. Spill Control and Emergency Procedures

3

## **Defining Hazardous Waste**

What is Hazardous Waste?

Hazardous waste begins its life as a hazardous material (solid, liquid or gas). Once the material has been used, and/or is no longer useful, the material is declared to be waste

UNLESS the material is recycled

4

## **Regulating Agencies Who Influence HazWaste Mgmt.**

- ❖ U. S. Environmental Protection Agency (EPA) and OEPA
- ❖ Occupational Safety and Health Agency (OSHA)
- ❖ Department of Transportation (DOT)
- ❖ Nat'l Fire Protection Association (NFPA)
- ❖ City of Norwood Fire Department

5

## **Specific Regulatory Citations**

The Code of Federal Regulations (CFR) provide a wealth of information about today's topics.

40 CFR 261 and 262 addresses definition and characterization of waste

29 CFR 1910 concerns employee health and safety (HazCom etc...)

49 CFR 126 and 181 transport issues

6

## *Cradle to Grave Management*

- ❖ RCRA demands management from beginning to end
- ❖ Provides method of accountability
- ❖ Legally enforceable jail and fines
- ❖ Sets limits and timeframes
- ❖ Created Superfund to clean up abandoned sites

7

## *ACCOUNTABILITY*

- ❖ Everyone gets an generator I.D. #!
- ❖ This number is used throughout the waste mgmt. and disposal cycle
- ❖ A hazardous waste manifest is the control document. It is a legally enforceable document!
- ❖ OEPA periodically inspects our plant

8

## *WASTE GENERATOR*

Waste generators are divided into three categories depending on volume

- ❖ Exempt Small Quantity Generator- no more than 100 kilograms per month
- ❖ Small Quantity Generator- 101-999 kilograms per month
- ❖ Large Quantity Generator- more than 1000 kilograms per month

9

## *DEFINING WASTE CODES*

- ❖ 40 CFR 261.23- 33 defines waste in two basic ways, by characteristic or source:

### D Wastes Characteristic Wastes

- ❖ Ignitability- liquid w/ flashpoint below 140F
- ❖ Corrosivity- pH 2 or less, 12.5 or more
- ❖ Reactivity- unstable or explosive
- ❖ Toxicity- health or environmental hazard

10

## *EPA HAZARDOUS WASTE SOURCE LIST*

- ❖ Specific Source List
- ❖ Non-specific Source List
- ❖ Discarded Commercial Chemical Product List
- ❖ Equipment Cleaning or Repair

11

## *WASTE PROFILES*

- ❖ Defined by generator knowledge MSDS, and/or lab analysis
- ❖ Needs to be submitted to TSDF and accepted by them, before shipping
- ❖ TSDF must be permitted to accept
- ❖ Inaccurate profile will result in "off-spec" fees. Could affect manifest!

12

### *Documenting HazWaste Transportation and Disposal*

- ❖ A waste manifest is a legally binding document that follows a waste load throughout its lifecycle.
- ❖ Everyone involved gets a copy
- ❖ The generator must get the signed original back from the TSDF w/in 35 days. Keep manifests 3 years. Use EPA form 8700-22 and 22A

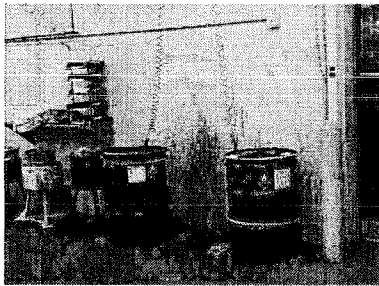
13

### *ONGOING MANAGEMENT*

- ❖ Keeping up with paperwork
- ❖ Using the right containers (DOT)
- ❖ Replacing old or illegable labels
- ❖ Shipping before 90 day time limit
- ❖ Auditing the disposal facilities
- ❖ Inspecting weekly, and dating and labeling containers

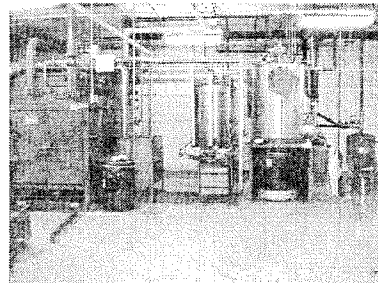
14

### *PRESS ROOM 101*



15

### *PMR FIRST FLOOR*



16

### *THIRD FLOOR PARTS WASHER*



17

### *KNOW WHAT WASTE YOU ARE HANDLING!!!*

- ❖ Get a copy of the MSDS and review it
- ❖ Understand key concepts of MSDS
- ❖ Know the hazards and how to affectively protect yourself
- ❖ Collect your tools before you start
- ❖ Inspect containers for damage
- ❖ Have a plan of action prepared

18

## **MSDS REVIEW**

- ❖ Identity, manufacturer phone #, emergency phone #
- ❖ Haz. ingredients, phys. & chem. characteristics, fire, reactivity, explosion data
- ❖ Occupational health, PEL, TWA, STEL routes of entry, first aid, PPE
- ❖ Storage, spills and disposal info.

19

## **GENERAL WASTE HANDLING PRACTICES**

- ❖ GROUNDING during handling and storage of flammables
- ❖ Work with a Buddy whenever poss.
- ❖ Protect yourself with PPE
- ❖ Know what you are working with
- ❖ Never mix wastes
- ❖ Do Not handle unknown materials

20

## **MOVING WASTE CONTAINERS**

- ❖ Thoroughly inspect container / lids
- ❖ Don Your PPE
- ❖ Secure container for movement
- ❖ Move to PRE-SELECTED area
- ❖ Reinspect container
- ❖ Check labels so they face outward

21

## **PERSONAL PROTECTION EQUIPMENT**

- At minimum, during waste handling employees will use the following PPE:
- ❖ Goggles, Face Shields, and Gloves
  - ❖ Chemical Apron or Coveralls
  - ❖ Protective Shoes
  - ❖ Appropriate Respirator (If Needed)

22

## **EFFECTIVE USE OF PPE**

- ❖ Define All Hazards Involved
- ❖ Understand the Routes of Entry
- ❖ Watch for Signs of Over-Exposure
- ❖ Care for and Maintain PPE
- ❖ Locate Emergency Showers, Eyewash Stations, and First Aid Kits
- ❖ Be ALERT to break-through

23

## **FOUR ROUTES OF ENTRY INTO THE HUMAN BODY**

- ❖ Inhalation-- nose and lungs
- ❖ Ingestion-- mouth, throat, and stomach
- ❖ Permeation-- through skin and mucous membrane, and eyes
- ❖ Puncturing-- into tissue (less common)

24

## **TWO TYPES OF EXPOSURE**

- ❖ **Chronic**-- Repeated exposure, lower dose, not necessarily less danger
- ❖ **Acute**-- Sudden exposure, higher doses, more likely to have serious illness or death

PPE helps reduce exposure and control health risks. Use it!

25

## **DEFINITION OF A SPILL**

- ❖ **SMALL SPILL**- less than 10 gallons, in immediate area, w/ known material
- ❖ **LARGE SPILL**- more than 10 less than 55 gallons. Must call AS! Incident Rpt.
- ❖ **SPILL EMERGENCY**- anything over 55 gallons. Must call AS! EC may call for outside assistance. Incident Report.

26

## **SPILL CONTROL PROCEDURES**

- ❖ Isolate area, get other employees out
- ❖ Call AS with location, chemical, quantity, request medical assistance
- ❖ Collect spill tools and PPE, don PPE
- ❖ Implement spill control/clean-up
- ❖ Put wastes in containers
- ❖ Transport waste for storage, date/label

27

## **SPILL CONTROL TOOLS AND SUPPLIES**

- ❖ **SPILL CABINETS**- in process areas
- ❖ **Contain**- absorbent products, drain covers, non-spark shovel, gloves etc...
- ❖ Other Non-sparking tools from AS
- ❖ LEL/Oxygen meter from EH & S Mgr.
- ❖ Need to notify AS or EH & S Mgr. if spill supplies run low

28

## **WHO MAY CLEAN-UP A CHEMICAL/WASTE SPILL?**

- ❖ The following employees are allowed:
- ❖ **Pressman, Pressman Assistant**
- ❖ **Helpers**
- ❖ **Rolltenders**
- ❖ **Pre-make Ready**

29

## **EMERGENCY PROCEDURES**

- ❖ **Employee Contacts Area Supervisor**
- ❖ **Area Supervisor Contacts Plant Manager/Emergency Coordinator**
- ❖ **Plant Manager/EC decides course of action, to call 911 etc...**
- ❖ **EC may call on Plant Emergency Organization to assist in emergency**

30

### *Emergency Procedures Cont.*

- ❖ Know signals and evacuation routes (they are posted near exits/doorways)
- ❖ Evacuate when signaled and go to your assembly point-- take roll call
- ❖ Stay in evacuation area
- ❖ No employee shall leave assembly area, unless permission from AS/EC

31

### *In An Emergency Remember*

- ❖ Don't take on more than you're trained to do
- ❖ Communicate with others and superv.
- ❖ Use your PPE
- ❖ Be accounted for at roll call
- ❖ Know emergency plans and signals
- ❖ Think before you act

32

### *After The Emergency*

- ❖ Assure area is safety to re-enter
- ❖ Re-stock or decon. used equipment
- ❖ File incident/accident report
- ❖ EC will send reports to gov't agencies
- ❖ Implement any needed changes to operating practices, to avoid future incidents.

33

### **Universal Waste Procedures Used Fluorescent lamps**

The EPA regulates fluorescent lamps as **Universal Waste**. The following procedures must be followed when storing and disposing of spent fluorescent lamps. This regulation applies to Fluorescent, High-pressure Sodium, Mercury Vapor, and Metal Halide lamps.

#### **Containers**

Must be:

Adequate to prevent breakage of spent lamps.

Closed except when adding lamps.

#### **Labeling**

"Used Lamps" or "Waste Lamps" or "Universal Waste - Lamps."

Include the start date that the first spent tube was placed in the container.

#### **Disposal**

DO NOT put fluorescent lamps in the waste dumpster. Store them in the designated container.  
(GREEN-ENDED TUBES ARE OK TO PLACE IN THE DUMPSTER)

Accumulate spent lamps for up to one year, and then send them to a recycler. (Spent lamps cannot be stored for longer than one year.)

#### **Response to Breakage**

Immediately and SAFELY place broken lamps into a closed container.

#### **Training**

Be sure you have been trained about the proper handling, management and emergency procedures related to used fluorescent lamps.

34





State of Ohio Environmental Protection Agency

Southwest District Office

*Smurfit Stone*  
*Di-na-cal*  
*compliance*

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

Bob Taft, Governor  
Maureen O'Connor, Lt. Governor  
Christopher Jones, Director

April 24, 2002

Lonnie Grayson  
Smurfit Stone, Di-na-cal Label Group  
4500 Beech Street  
Cincinnati, Ohio 45212

Dear Mr. Grayson:

This is a follow up letter to the notice of violation sent on April 19, 2002. The generator identification number for the facility is OHD056487101. The facility is currently operating as a large quantity generator.

**Return to Compliance**

During the inspection on April 10, 2002, I noted a violation of OAC 3745-65-16(C) which requires employees to take part in an annual review of the initial training.

On April 19, 2002, our office received from you a copy of the recent training and attendees. After our telephone conversation today, it was determined that Smurfit Stone Di-Na-Cal Label Group has now returned to compliance with OAC 3745-65-16(C).

All other violations that had been noted during the inspection were addressed during the inspection on April 10, 2002.

Thanks for your immediate response to these issues. If you have any questions or comments, please contact me at 937-285-6080.

Sincerely,

Debora Depweg  
Division of Hazardous Waste Management  
Ohio EPA

cc: Tammy McConnell, CO  
File

**NOTICE:**

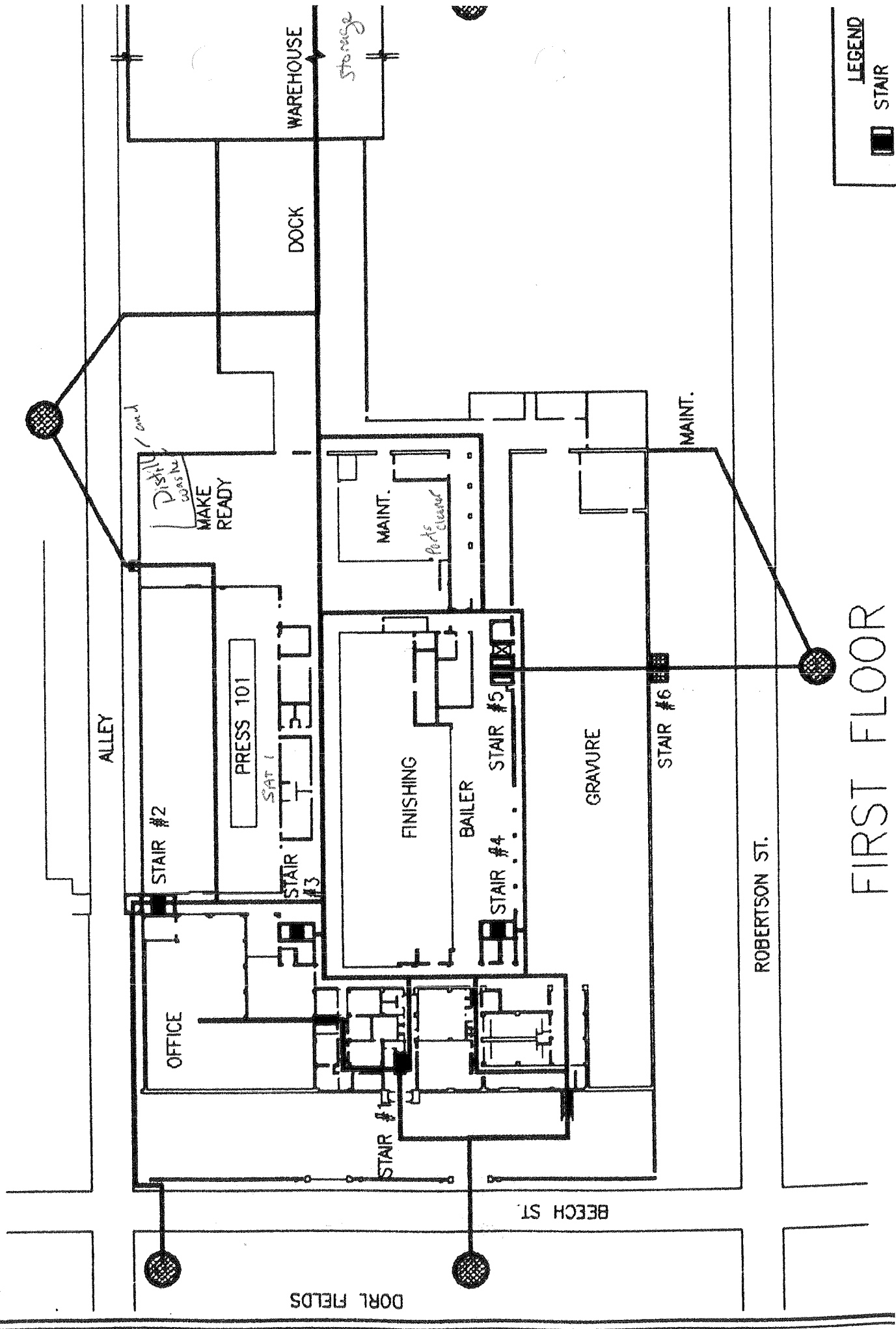
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

UNIVERSITY OF  
Di Na Cal  
Beech St- Cincinnati OH

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Smurfit Stone		Di-Na-Cal Label		Facility Type: LQG/SG/IC/ES/QG/TSD		EPA ID#: OH D056487101		
Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	
1 <del>Process</del> Grinding Cleaning	Solvent paint white	D001 D005 D035 F003 F005	~	drums			Petro chem processing Lygastle? mid 90s 0615298	
2 Machine cleaning	paint chips solids spent solvent	D001 D005 D035 F003 F005		drums			"	
3 General process operation	Waste ink	Same		drums			"	
4 oil separator from Compressor	used oil	Non Haz used oil		drums				Reclaimed Energy, Covingtonville TN
5 distiller	Spent solvent	D001 D005 D035 F003 F005		drum		Reclaimed		.

parts Cleaner      Total ~ 27 drums/month      haz waste      Safety Klean, Hebron OH



LEGEND  
STAIR

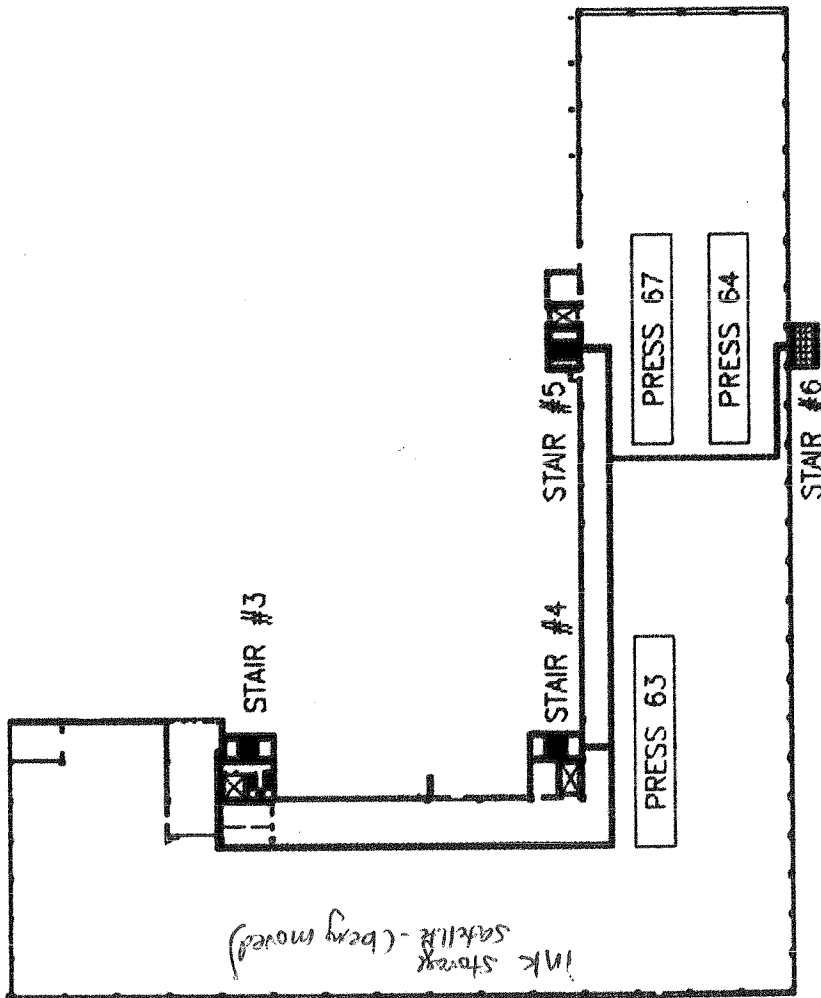
FIRST FLOOR

DORL FIELDS

BEECH ST.

ALLEY

ROBERTSON ST.



4/2/02

# THIRD FLOOR

# Ashland Distribution Company

## WASTE PROFILE

(2/96)

SIC Code

Form Code

Source Code

B

A

ASH 05-5714

☐ Check here if this is a recertification

### GENERAL INFORMATION

Generator Name: Dinagraphics  
Generator Address: Beech and Robertson  
Cincinnati, Ohio 45212  
Technical Contact: Lonnie Grayson  
Phone: (513) 396-5627  
Fax: (513) 396-5615  
Ashland Sales Rep: Bernie Bissmeyer  
Phone: 937-298-2818  
Fax: 937-298-5759

Generator USEPA ID#: OHD 056 487 101  
Generator State ID#: \_\_\_\_\_  
Billing Address: ASHLAND DISTRIBUTION COMPANY  
2854 Springboro West  
Moraine, OH 45439  
Billing Contact: Donna Kondrath  
Phone: 937-298-2818  
Fax: 937-298-5759

### PROPERTIES AND COMPOSITION

Process Generating Waste: Cleanup of Press Units  
Waste Name: Waste Water Sludge  
Is this a USEPA hazardous waste(40CFR Part 261)? Yes ☒ No ☐ Wastewater ☐ Non-wastewater ☒  
Identify ALL USEPA listed and characteristic waste code numbers: D001 D035 F003 F005  
State Waste Codes: \_\_\_\_\_  
Physical State @ 70 °F: Solid ☐ Liquid ☐ Both ☒ Single Layer ☐ Multilayer ☒ Free liquid range: 65 to 100 %  
pH: Range 4.0 to 10.0 OR N/A ☐ Strong odor ☐ Describe solvent Color varies  
Liquid Flash Point <73°F ☐ 73-99°F ☒ 100-139°F ☐ 140-199°F ☐ ≥200°F ☐ N/A ☐ Closed Cup ☒ Open Cup ☐

CHEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
Water	75-90%	Ethyl Alcohol	1-3%
MEK	3-5%	Toluene & Ethyl Acetate	2-4%
Hexane	1-2%	Aliphatic Hydrocarbons	1-3%
Propyl Acetate	1-2%	Propyl Alcohol	1-2%
Propylene Glycol	1-3%	Methyl Alcohol	1-2%

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

### SHIPPING INFORMATION

Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: 55 g drum Other \_\_\_\_\_  
Anticipated volume: 20-50 Shipping Frequency: quarterly

### SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☐  
Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_  
Generator's Agent Supervising Sampling: \_\_\_\_\_

### OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: .85 to .95 OR Actual \_\_\_\_\_ UHC present ☐  
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☐ <5,000 OR ☒ >5,000

4/10/02

GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

ASH 05-5714

rofile #

CONTAMINANTS: ☐ TCLP ☐ TOTAL ☐ NONE IN THIS SECTION PRESENT

REGULATORY				REGULATORY			
EPA#	NAME	LEVEL	ACTUAL	EPA#	NAME	LEVEL	ACTUAL
D004	Arsenic	<input type="checkbox"/> >5.0		D024	m-Cresol	<input type="checkbox"/> >200.0	
D005	Barium	<input type="checkbox"/> >100.0		D025	p-Cresol	<input type="checkbox"/> >200.0	
D006	Cadmium	<input type="checkbox"/> >1.0		D026	Cresol (total)	<input type="checkbox"/> >200.0	
D007	Chromium	<input type="checkbox"/> >5.0		D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D008	Lead	<input type="checkbox"/> >5.0		D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D009	Mercury	<input type="checkbox"/> >0.2		D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D010	Selenium	<input type="checkbox"/> >1.0		D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D011	Silver	<input type="checkbox"/> >5.0		D031	Heptachlor	<input type="checkbox"/> >0.008	
D012	Endrin	<input type="checkbox"/> >0.02		D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D013	Lindane	<input type="checkbox"/> >0.4		D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D014	Methoxychlor	<input type="checkbox"/> >10.0		D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D015	Toxaphene	<input type="checkbox"/> >0.5		D035	Methyl ethyl ketone	<input checked="" type="checkbox"/> >200.0	
D016	2,4-D	<input type="checkbox"/> >10.0		D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0		D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D018	Benzene	<input type="checkbox"/> >0.5		D038	Pyridine	<input type="checkbox"/> >5.0	
D019	Carbon tetrachloride	<input type="checkbox"/> >0.5		D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D020	Chlordane	<input type="checkbox"/> >0.03		D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D021	Chlorobenzene	<input type="checkbox"/> >100.0		D041	2,4,5 -Trichlorophenol	<input type="checkbox"/> >400.0	
D022	Chloroform	<input type="checkbox"/> >6.0		D042	2,4,6 -Trichlorophenol	<input type="checkbox"/> >2.0	
D023	o-Cresol	<input type="checkbox"/> >200.0		D043	Vinyl chloride	<input type="checkbox"/> >0.2	

TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☒ Yes ☐ No

Proper Shipping Name: R.Q. Waste Flammable Liquid, N.O.S.

( MEK and Ethyl Alcohol )

Hazard Class: 3 I.D.#: UN1993 Packing Group: II

Additional Description: D001 D035 F003 F005

CERCLA Reportable Quantity 100 RQ Units (lb/kg): lbs ERG#

SPECIAL HANDLING:

Additional Page(s) Attached ☐

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize disposer to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.

ON BEHALF OF SUEPIT-STONE CONTAINER CORP.

Signature Jeanne C. Grayson Printed (or typed) name and title Jeanne C. Grayson MGR/ENV. ENGR Date 12/7/12/2000

Authorization to correct profile sheet: I authorize Ashland Distribution Co. to act as my agent to make corrections to this profile sheet, such corrections being consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that a corrected copy will be sent to me. ☐ YES ☐ NO INITIAL:

4/10/02

# Ashland Distribution Company

## WASTE PROFILE

(2/96)

SIC Code

Form Code

Source Code

B

A

ASH 05-5713

☐ Check here if this is a recertification

### GENERAL INFORMATION

Generator Name: Dinagraphics Generator USEPA ID#: OHD 056 487 101  
Generator Address: Beech and Robertson Generator State ID#: \_\_\_\_\_  
Cincinnati, Ohio 45212  
Billing Address: ASHLAND DISTRIBUTION COMPANY  
Technical Contact: Lonnie Grayson 2854 Springboro West  
Phone: (513) 396-5627 Moraine, OH 45439  
Fax: (513) 396-5615  
Ashland Sales Rep: Bernie Bissmeyer Billing Contact: Donna Kondrath  
Phone: 937-298-2818 Phone: 937-298-2818  
Fax: 937-298-5759 Fax: 937-298-5759

### PROPERTIES AND COMPOSITION

Process Generating Waste: Cleanup of Press Units  
Waste Name: Waste Solvent Sludge  
Is this a USEPA hazardous waste(40CFR Part 261)? Yes ☒ No ☐ Wastewater ☐ Non-wastewater ☒  
Identify ALL USEPA listed and characteristic waste code numbers: D001 D035 F003 F005 D005  
State Waste Codes: \_\_\_\_\_  
Physical State @ 70 °F: Solid ☐ Liquid ☐ Both ☒ Single Layer ☐ Multilayer ☒ Free liquid range: 65 to 100 %  
pH: Range 4.0 to 10.0 OR N/A ☐ Strong odor ☐ Describe solvent Color varies  
Liquid Flash Point <73°F ☐ 73-99°F ☒ 100-139°F ☐ 140-199°F ☐ ≥200°F ☐ N/A ☐ Closed Cup ☒ Open Cup ☐

CHEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
MEK	40-50%	Ethyl Alcohol	20-25%
Hexane	3-5%	Toluene	5-10%
Propyl Acetate	5-10%	Aliphatic Hydrocarbons	5-10%
Ethyl Acetate	5-10%	Propyl Alcohol	1-2%
Propylene Glycol	1-5%	Methyl Alcohol	0-1%

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

### SHIPPING INFORMATION

Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: 55 g drum Other \_\_\_\_\_  
Anticipated volume: 300-400 Shipping Frequency: quarterly

### SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☐  
Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_  
Generator's Agent Supervising Sampling: \_\_\_\_\_

### OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: .78 to .94 OR Actual \_\_\_\_\_ UHC present ☐  
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☐ <5,000 OR ☒ >5,000

4/10/02

# GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

ASH 05-5713

File #

CONTAMINANTS: ☐ TCLP ☐ TOTAL ☐ NONE IN THIS SECTION PRESENT

## REGULATORY

## REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D004	Arsenic	<input type="checkbox"/> >5.0	
D005	Barium	<input checked="" type="checkbox"/> >100.0	
D006	Cadmium	<input type="checkbox"/> >1.0	
D007	Chromium	<input type="checkbox"/> >5.0	
D008	Lead	<input type="checkbox"/> >5.0	
D009	Mercury	<input type="checkbox"/> >0.2	
D010	Selenium	<input type="checkbox"/> >1.0	
D011	Silver	<input type="checkbox"/> >5.0	
D012	Endrin	<input type="checkbox"/> >0.02	
D013	Lindane	<input type="checkbox"/> >0.4	
D014	Methoxychlor	<input type="checkbox"/> >10.0	
D015	Toxaphene	<input type="checkbox"/> >0.5	
D016	2,4-D	<input type="checkbox"/> >10.0	
D017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0	
D018	Benzene	<input type="checkbox"/> >0.5	
D019	Carbon tetrachloride	<input type="checkbox"/> >0.5	
D020	Chlordane	<input type="checkbox"/> >0.03	
D021	Chlorobenzene	<input type="checkbox"/> >100.0	
D022	Chloroform	<input type="checkbox"/> >6.0	
D023	o-Cresol	<input type="checkbox"/> >200.0	

EPA#	NAME	LEVEL	ACTUAL
D024	m-Cresol	<input type="checkbox"/> >200.0	
D025	p-Cresol	<input type="checkbox"/> >200.0	
D026	Cresol (total)	<input type="checkbox"/> >200.0	
D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D031	Heptachlor	<input type="checkbox"/> >0.008	
D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D035	Methyl ethyl ketone	<input checked="" type="checkbox"/> >200.0	
D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D038	Pyridine	<input type="checkbox"/> >5.0	
D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D041	2,4,5 -Trichlorophenol	<input type="checkbox"/> >400.0	
D042	2,4,6 -Trichlorophenol	<input type="checkbox"/> >2.0	
D043	Vinyl chloride	<input type="checkbox"/> >0.2	

## TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☒ Yes ☐ No

Proper Shipping Name: R.Q. Waste Flammable Liquid, N.O.S.

( Toluene and MEK )

Hazard Class: 3 I.D.#: UN1993 Packing Group: II

Additional Description: D001 D035 F003 F005 D005

CERCLA Reportable Quantity 100 RQ Units (lb/kg): lbs ERG#

SPECIAL HANDLING:

Additional Page(s) Attached ☐

## GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize disposer to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.

Leanne C. Grayson  
Signature

Leanne C. Grayson Mech/Env. Engineer  
Printed (or typed) name and title

7/12/00  
Date

Authorization to correct profile sheet: I authorize Ashland Distribution Co. to act as my agent to make corrections to this profile sheet, such corrections being consistent with the sample presented for characterization and/or regulatory requirements of state federal agencies. I understand that a corrected copy will be sent to me. ☐ YES ☐ NO INITIAL:

4/10/02



# Ashland Distribution Company

## WASTE PROFILE

(2/96)

SIC Code

Form Code

Source Code

B

A

ASH 05-6038

☐ Check here if this is a recertification

### GENERAL INFORMATION

Generator Name: Dinagraphics Generator USEPA ID#: OHD 056 487 101  
Generator Address: Beech and Robertson Generator State ID#: \_\_\_\_\_  
Cincinnati, Ohio 45212  
Billing Address: ASHLAND DISTRIBUTION COMPANY  
Technical Contact: Lonnie Grayson 2854 Springboro West  
Phone: (513) 396-5627 Moraine, OH 45439  
Fax: (513) 396-5615  
Ashland Sales Rep: Bernie Bissmeyer Billing Contact: Donna Kondrath  
Phone: 937-298-2818 Phone: 937-298-2818  
Fax: 937-298-5759 Fax: 937-298-5759

### PROPERTIES AND COMPOSITION

Process Generating Waste: Cleanup  
Waste Name: Waste Absorbent Pigs  
Is this a USEPA hazardous waste(40CFR Part 261)? Yes ☒ No ☐ Wastewater ☐ Non-wastewater ☒  
Identify ALL USEPA listed and characteristic waste code numbers: D001 D035 D005 F003 F005  
State Waste Codes: \_\_\_\_\_  
Physical State @ 70 °F: Solid ☒ Liquid ☐ Both ☐ Single Layer ☐ Multilayer ☒ Free liquid range: 0 to 0 °  
pH: Range 4.0 to 10.0 OR N/A ☐ Strong odor ☐ Describe solvent/ oil Color varies  
Liquid Flash Point <73°F ☒ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥200°F ☐ N/A ☐ Closed Cup ☒ Open Cup ☐

CHEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
Absorbent Pigs	95-98%		
Aromatic Distillates	0-3%		
Oils	0-3%		
Aliphatic Distillates	0-3%		

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

### SHIPPING INFORMATION

Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: 55 g drum Other \_\_\_\_\_  
Anticipated volume: 3 drums Shipping Frequency: quarterly

### SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☐  
Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_  
Generator's Agent Supervising Sampling: \_\_\_\_\_

### OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: 1.23 to 1.78 OR Actual \_\_\_\_\_ UHC present ☐  
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☐ <5,000 OR ☒ >5,000

4/10/02

# GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

ASH 05-6038

Profile #

CONTAMINANTS: ☐ TCLP ☐ TOTAL ☐ NONE IN THIS SECTION PRESENT

## REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D004	Arsenic	<input type="checkbox"/> >5.0	
D005	Barium	<input checked="" type="checkbox"/> >100.0	
D006	Cadmium	<input type="checkbox"/> >1.0	
D007	Chromium	<input type="checkbox"/> >5.0	
D008	Lead	<input type="checkbox"/> >5.0	
D009	Mercury	<input type="checkbox"/> >0.2	
D010	Selenium	<input type="checkbox"/> >1.0	
D011	Silver	<input type="checkbox"/> >5.0	
D012	Endrin	<input type="checkbox"/> >0.02	
D013	Lindane	<input type="checkbox"/> >0.4	
D014	Methoxychlor	<input type="checkbox"/> >10.0	
D015	Toxaphene	<input type="checkbox"/> >0.5	
D016	2,4-D	<input type="checkbox"/> >10.0	
D017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0	
D018	Benzene	<input type="checkbox"/> >0.5	
D019	Carbon tetrachloride	<input type="checkbox"/> >0.5	
D020	Chlordane	<input type="checkbox"/> >0.03	
D021	Chlorobenzene	<input type="checkbox"/> >100.0	
D022	Chloroform	<input type="checkbox"/> >6.0	
D023	o-Cresol	<input type="checkbox"/> >200.0	

## REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D024	m-Cresol	<input type="checkbox"/> >200.0	
D025	p-Cresol	<input type="checkbox"/> >200.0	
D026	Cresol (total)	<input type="checkbox"/> >200.0	
D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D031	Heptachlor	<input type="checkbox"/> >0.008	
D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D035	Methyl ethyl ketone	<input checked="" type="checkbox"/> >200.0	
D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D038	Pyridine	<input type="checkbox"/> >5.0	
D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D041	2,4,5 -Trichlorophenol	<input type="checkbox"/> >400.0	
D042	2,4,6 -Trichlorophenol	<input type="checkbox"/> >2.0	
D043	Vinyl chloride	<input type="checkbox"/> >0.2	

## TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☒ Yes ☐ No

Proper Shipping Name: R.Q. Waste Flammable Solids, N.O.S.

( Aromatic and Aliphatic Petroleum Distillates )

Hazard Class: 4.1 I.D.#: UN1325 Packing Group: II

Additional Description: D001 D005 D035 F003 F005

CERCLA Reportable Quantity 100 RQ Units (lb/kq): lbs ERG#

SPECIAL HANDLING:

Additional Page(s) Attached ☐

## GENERATOR'S CERTIFICATION

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Signature Lonnie C. Grayson 07/12/2000  
Printed (or typed) name and title Date

Authorization to correct profile sheet. I authorize Ashland Distribution Co. to act as my agent to make corrections to this profile sheet, such corrections being consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that a corrected copy will be sent to me. ☐ YES ☐ NO INITIAL:

4/10/02

# Ashland Distribution Company

## WASTE PROFILE

(2/96)

SIC Code

Form Code

Source Code

B

A

ASH 05-6365

☐ Check here if this is a recertification

### GENERAL INFORMATION

Generator Name: DinaGraphics Generator USEPA ID#: OHD 056 487 101  
Generator Address: Beech and Robertson Generator State ID#: \_\_\_\_\_  
Cincinnati, Ohio 45212  
Billing Address: ASHLAND DISTRIBUTION COMPANY  
Technical Contact: Lonnie Grayson 2854 Springboro West  
Phone: (513) 396-5627 Moraine, OH 45439  
Fax: (513) 396-5615  
Ashland Sales Rep: Bernie Bissmeyer Billing Contact: Donna Kondrath  
Phone: 937-298-2818 Phone: 937-298-2818  
Fax: 937-298-5759 Fax: 937-298-5759

### PROPERTIES AND COMPOSITION

Process Generating Waste: PM on Equipment  
Waste Name: Waste Oil  
Is this a USEPA hazardous waste(40CFR Part 261)? Yes ☐ No ☒ Wastewater ☐ Non-wastewater ☒  
Identify ALL USEPA listed and characteristic waste code numbers: \_\_\_\_\_

State Waste Codes: \_\_\_\_\_  
Physical State @ 70 °F: Solid ☐ Liquid ☒ Both ☐ Single Layer ☒ Multilayer ☐ Free liquid range: 98 to 100 %  
pH: Range \_\_\_\_\_ to \_\_\_\_\_ OR N/A ☒ Strong odor ☐ Describe \_\_\_\_\_ Color dark  
Liquid Flash Point <73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥200°F ☒ N/A ☐ Closed Cup ☒ Open Cup ☐

CHEMICAL COMPOSITION: List ALL constituents present in any concentration and forward available analysis.

Constituents	Range/Units	Constituents	Range/Units
Oil	100%		

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

Analytical data attached ☐

### SHIPPING INFORMATION

Packaging: Bulk Solid ☐ Bulk Liquid ☐ Drum ☒ Type/Size: 55 g drum Other \_\_\_\_\_  
Anticipated volume: 1-4 drums Shipping Frequency: quarterly

### SAMPLING INFORMATION

Is a sample required? YES ☐ NO ☒ MSDS attached ☐  
Date Sampled: \_\_\_\_\_ Sampler's Name/Company: \_\_\_\_\_  
Generator's Agent Supervising Sampling: \_\_\_\_\_

### OTHER HAZARDOUS CHARACTERISTICS

Specific Gravity: Range: .78 to .85 OR Actual \_\_\_\_\_ UHC present ☐  
Is this a Benzene NESHAP Waste?: ☐ YES ☒ NO BTU Value (per pound): ☐ <5,000 OR ☒ >5,000

4/10/02

## GENERATOR'S WASTE MATERIAL PROFILE SHEET (CONTINUED)

ASH 05-6365

rofile #

CONTAMINANTS: ☐ TCLP ☐ TOTAL ☐ NONE IN THIS SECTION PRESENT

## REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D004	Arsenic	<input type="checkbox"/> >5.0	
D005	Barium	<input type="checkbox"/> >100.0	
D006	Cadmium	<input type="checkbox"/> >1.0	
D007	Chromium	<input type="checkbox"/> >5.0	
D008	Lead	<input type="checkbox"/> >5.0	
D009	Mercury	<input type="checkbox"/> >0.2	
D010	Selenium	<input type="checkbox"/> >1.0	
D011	Silver	<input type="checkbox"/> >5.0	
D012	Endrin	<input type="checkbox"/> >0.02	
D013	Lindane	<input type="checkbox"/> >0.4	
D014	Methoxychlor	<input type="checkbox"/> >10.0	
D015	Toxaphene	<input type="checkbox"/> >0.5	
D016	2,4-D	<input type="checkbox"/> >10.0	
D017	2,4,5-TP (Silvex)	<input type="checkbox"/> >1.0	
D018	Benzene	<input type="checkbox"/> >0.5	
D019	Carbon tetrachloride	<input type="checkbox"/> >0.5	
D020	Chlordane	<input type="checkbox"/> >0.03	
D021	Chlorobenzene	<input type="checkbox"/> >100.0	
D022	Chloroform	<input type="checkbox"/> >6.0	
D023	o-Cresol	<input type="checkbox"/> >200.0	

## REGULATORY

EPA#	NAME	LEVEL	ACTUAL
D024	m-Cresol	<input type="checkbox"/> >200.0	
D025	p-Cresol	<input type="checkbox"/> >200.0	
D026	Cresol (total)	<input type="checkbox"/> >200.0	
D027	1,4-Dichlorobenzene	<input type="checkbox"/> >7.5	
D028	1,2-Dichloroethane	<input type="checkbox"/> >0.5	
D029	1,1-Dichloroethylene	<input type="checkbox"/> >0.7	
D030	2,4-Dinitrotoluene	<input type="checkbox"/> >.13	
D031	Heptachlor	<input type="checkbox"/> >0.008	
D032	Hexachlorobenzene	<input type="checkbox"/> >0.13	
D033	Hexachloro-1,3-butadiene	<input type="checkbox"/> >0.5	
D034	Hexachloroethane	<input type="checkbox"/> >3.0	
D035	Methyl ethyl ketone	<input type="checkbox"/> >200.0	
D036	Nitrobenzene	<input type="checkbox"/> >2.0	
D037	Pentachlorophenol	<input type="checkbox"/> >100.0	
D038	Pyridine	<input type="checkbox"/> >5.0	
D039	Tetrachloroethylene	<input type="checkbox"/> >0.7	
D040	Trichloroethylene	<input type="checkbox"/> >0.5	
D041	2,4,5 -Trichlorophenol	<input type="checkbox"/> >400.0	
D042	2,4,6 -Trichlorophenol	<input type="checkbox"/> >2.0	
D043	Vinyl chloride	<input type="checkbox"/> >0.2	

## TRANSPORTATION INFORMATION

Is this a DOT Hazardous Material? ☐ Yes ☒ NoProper Shipping Name: NON - REGULATED MATERIAL

Hazard Class: \_\_\_\_\_ I.D.#: \_\_\_\_\_ Packing Group: \_\_\_\_\_

Additional Description: \_\_\_\_\_

CERCLA Reportable Quantity \_\_\_\_\_ RQ Units (lb/kg): \_\_\_\_\_ ERG# \_\_\_\_\_

SPECIAL HANDLING: \_\_\_\_\_

Additional Page(s) Attached ☐

## GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize disposer to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.

Lonnie C. Grayson ON BEHALF OF SMURFIT CO.  
 Signature Printed (or typed) name and title Date 7/10/2000

Authorization to correct profile sheet: I authorize Ashland Distribution Co. to act as my agent to make corrections to this profile sheet, such corrections being consistent with the sample presented for characterization and/or regulatory requirements of state and federal agencies. I understand that a corrected copy will be sent to me. ☐ YES ☐ NO INITIAL: \_\_\_\_\_

4/10/02

# AUGUST 20TH-26TH

Gravure			
101	THIRD	FIRST	SECOND
PRESS 101			
CREW LEADER	D. COOPER	R. KNEPPER	B. WALLEY
ASST. CREW LDR.	J. FREY	C. CHADWELL	G. STEVENS
CREW MEMBER	C. CRUMP	Y. PATTERSON	R. WOODRUM
CREW MEMBER	S. CONLEY	D. WALTERS	L. CAMPBELL
PRE-MAKE READY TEAMS			
INK	D. COOK	D. BYRD	C. ROGERS
CYLINDERS		D. MILLS	C. GROHS
PMR UTILITY	M. FLISCHEL	B. REYNOLDS	D. HUTCHINSON
ASSEMBLER	B. ASHORN	L. MCWILLIAMS	T. ROLFES
Finishing			
	THIRD	FIRST	SECOND
Slitting			
201	A. SUNDERHAUS	B. WALL	G. KIMBLE
202	M. LAFLIN	J. LIEBERT	B. OGDEN
203			
204			
Inspectors			
301	D. HARPER	M. MCWILLIAMS	J. RUGGLES
302	D. BORGEMENKE	J. ANDERSON	F. WOSTER
303			
304			
SHIP/PACKER	G. WIEHOFF	D. BURWICK	T. ROGERS
PORTER	F. COOPER	J. FERGUSON	C. PATTON
SHIPPING		R. WAGNER	
MAINTENANCE	PAINTER, COLSON	S. BURTON,	
VACATION GRAVURE	J. WILCOX P. COOPER		
VACATION FINISHING	P. WADE M. FOLEY		
SICK	J. COOPER,	EXTRA; S. FREEMAN T. WALKER	
Restricted duty	WILLIAMS		
MAINT. SHIP VACATIONS			
LAY OFF	SEE ATTACHED LIST		

4/10/02

I Connie Grayson certify that the below sign-on  
employees have been trained in awareness of RCRA.

**MAIN TOPIC:** Supervisor Training- RCRA, Confined Space

**OTHER TOPIC:** ~~LOTS~~, Review of the written programs

**Date:** 10/12-10/13 2000

Anderson	Jenny
Ashorn	Robert
Ballman	Brian
Baker	Robert
Bauer	Gary
Binkley	Donna
Blevins	Philip
Borgemenke	Daniel
Borgemenke	Neal
Brown	Tamara
Burwick	Daniel
Byrd	Danny
Campbell	Leonard
Chadwell	Connie
Coffey	Steven
Conley	Scott
Conner	Lanna
Cook	Dallas
Cooper	Douglas
Cooper	Floyd
Cooper	Jerry
Cooper	Philip
Crump	Chryll
Cunningham	John
Downey	Robert
Edrington	Wanda
Ense	Bruce

*Steven Coffey*

*Lanna Conner*

4/10/02

Ferguson	James
Flischel	Michael
Foley	Michael
Freeman	Susan
Frey	John
Fuller	Kenneth
Grayson	Lonnie
Grohs	Carl
Hagaman	Steven
Harper	Donna
Harper	Robert
Haverland	Sharon
Herbe	Dave
Hines	Donald
Hipp	Steven
Hutchinson	David
James	Randy
Jones	Fred
Jones	William
Kessler	Leonard
Kimble	Gregory
Kirn	Mark
Kisker	Dave
Knepper Jr.	Richard
Kuykendall	Jeffrey
Laflin	William
Lerman	Rick
Liebert	John
Martin	Leslie
Mattson	Patricia
McCall	Michael
McGuire	John
McKoy	Butch
McWilliams	Marnike
McWilliams	Luther

*Judd A. Jones*

*Mark Kim*

*Richard Lerman*

*B. McKoy*

4/10/02

Mills	Daniel	
Mourer	Bill	
Myrick	Michael	
Ogden	William	
Olgee	Tom	
Painter	J.Dave	
Patrick	Charles	
Patterson	Yvonne	
Patton	Carolyn	
Reynolds	Oscar	
Reynolds	William	
Ritchey	Sharon	
Rogers	Carl	
Rogers	Teresa	
Rolfes	Thomas	
Ruggles	June	
Ryan	Ralph	
Scott	Jackie	
Shanks	Andre	
Skiba	Terry	
Sorrell	Ronald	
Spivey	Bill	<i>Bill Spivey</i>
Stevens	George	
Sunderhaus	Andrew	
Swisher	Jim	
Thompson	Jim	<i>Jim Thompson (ing)</i>
Thurmond	Rodney	
Timmerman	Brett	<i>Brett</i>
Van Bever	Mo	
Vaughn	Jim	
Von Hagel	Tom	
Wade	Harold	
Wagner	Robert	
Wainscott	Sandy	<i>Sandra K. Wainscott</i>
Wainscott	Wallace	

*4/10/02*





MAIN TOPIC: Hazardous Communication, Right To Know

OTHER TOPIC: RCRA & Florescent Tube handling

Date: 05/11-12/00

I, Conner Gwynson certify that the following signed employees  
have received HAZARD COMMUNICATION, RIGHT-TO-KNOW, and RCRA REFRSH.  
TRAINING on 05/11-12/00.

Anderson	Jenny	
Ashorn	Robert	Bob Ashorn
Ballman	Brian	
Bauer	Gary	Gary Bauer
Binkley	Donna	Donna Binkley
Blevins	Philip	Philip Blevins
Borgemenke	Daniel	Daniel Borgemenke
Borgemenke	Neal	VAC.
Brown	Tamara	Tammy Brown
<del>Brown</del>	<del>Worley</del>	
Burwick	Daniel	Dan Burwick
Byrd	Danny	Danny Byrd
Campbell	Leonard	Leonard Campbell
Chadwell	Connie	C. Chadwell
Clouser	Wendy	
Coffey	Steven	Steve Coffey
Conley	Scott	Scott Conley
Conner	Lanna	Lanna Conner
Cook	Dallas	VACATION
Cooper	Douglas	Doug Cooper
Cooper	Floyd	Floyd Cooper
Cooper	Jerry	Jerry Cooper
Cooper	Philip	Philip Cooper
Crump	Chryll	Chryll Crump
Cunningham	John	John Cunningham
Dick	Doug	Doug Dick
Downey	Robert	Robert Downey
Ense	Bruce	
Ferguson	James	Jim Ferguson

Flischel	Michael	Michael Flischel
Foley	Michael	Michael Foley
Freeman	<del>Barbara</del> Susan	Sue Freeman
Frey	John	John Frey
Fuller	Kenneth	Kenneth Fuller
Grayson	Lonnie	
Grohs	Carl	S/L
Hagaman	Steven	Steve
Harper	Donna	Donna J. Harper ☺
Harper	Robert	S/L
Haverland	Sharon	Sharon Haverland
Herbe	Dave	Dave Herbe
Hester	John	
Hines	Donald	Donald Hines
Hipp	Steven	Steven Hipp
Hutchinson	David	David Hutchinson
James	Randy	P/B
Jones	Fred	S/L
Jones	William	William Jones
Kessler	Leonard	
Kimble	Gregory	Greg Kimble
Kirn	Mark	
Kisker	Dave	
Knepper Jr.	Richard	Richard Knepper
Kuykendall	Jeffrey	Jeff Kuykendall
Laboiteaux	Clifford	S/L
Laflin	William	VACATION
Lerman	Rick	
Liebert	John	John Liebert
Martin	Leslie	Leslie Ruth Martin
Mattson	Patricia	Pat Mattson
McGuire	John	John McGuire
McKoy	Butch	P/B McKoy
McWilliams	Marnike	Marnike McWilliams
McWilliams	Luther	VAC

Mills	Daniel	Daniel Mills
Mourer	Bill	Bill Mourer
Myrick	Michael	Michael Myrick
Naylor	David	David Naylor
Ogden	William	William Ogden
Olgee	Tom	Tom Olgee
Painter	J.Dave	J.Dave Painter
Patrick	Charles	Charles L. Patrick
Patterson	Yvonne	Yvonne Patterson
Patton	Carolyn	Patton, Carolyn
Pringle	Carl	Retired
Rau	Gale	Retired
Reynolds	Oscar	Oscar Reynolds
Reynolds	William	William Reynolds
Ritchey	Sharon	Sharon Ritchey
Rogers	Carl	Carl Rogers
Rogers	Teresa	Teresa Rogers
Rolfes	Thomas	Thomas Rolfes
Rottinghaus	Charles	Retired
Ruggles	June	June L. Ruggles
Ryan	Ralph	Ralph Ryan
Scott	Jackie	Jackie Scott
Shanks	Andre	Andre Shanks
Skiba	Terry	Terry Skiba
Snell	Charles	Retired Charles Snell
Sorrell	Ronald	Ronald Sorrell
Spivey	Bill	Bill Spivey
Stevens	George	George Stevens
Sunderhaus	Andrew	Andrew Sunderhaus
Swisher	Jim	Jim Swisher
Thompson	Jim	Jim Thompson
Thurmond	Rodney	Rodney Thurmond
Van Bever	Mo	M.O. VanBever
Von Hagel	Tom	Tom Von Hagel
Wade	Harold	Phil Wade

Wagner	Robert	X Robert Wagner
Wainscott	Sandy	Sandra K Wainscott
Wainscott	Wallace	Wallace Wainscott
Walker	James	VAC.
Wall	Robert	Robert Wall
Walley	William	William Walley
Walters	Daniel	VAC.
Wiehoff	Gregory	Megany E. Wiehoff
Wilcox	John	S/S
Williams	Cynthia	Cindy Williams
Wilson	Bill	Bill Wilson
Wood	Benjamin	Ben Wood
Woodrum	Ron	Ron B Woodrum
Woster	Fatima	P/B
Yee	Iggy	VAC.
Baker	Robert	Robert Baker
McCall	Mike	Mike McCall
Timmerman	Brett	Brett Timmerman
Wanda	Eckington	Wanda Eckington
Mills	JOSEPH	JOSEPH
PARKER	Terry	Terry Parker
Sensor	Bob	Bob Sensor

DATE	LEAKS	PERSONNEL, EQUIPMENT, TRAINING	GROUNDING	LABEL SUPPLY	SPILL CONTROL	COMMENTS	RESPONSE	INSP. BY
5/24/01	OK	OK	OK	OK	OK	350L		PS
5/29/01	OK	OK	OK	OK	OK	750L/1000L		PS
6/4/01	OK	OK	OK	OK	OK	1250L/1000L		PS
7/2/01	OK	OK	OK	OK	OK	3050L/4000L/1000L		PS
7/29/01	OK	OK	OK	OK	OK	2650L/1000L/1000L		PS
7/26/01	OK	OK	OK	OK	OK	3900L/5000L/1000L		PS
7/23/01	OK	OK	OK	OK	OK	4750L/7000L/1000L		PS
7/20/01	OK	OK	OK	OK	OK	5250L/7000L/1000L		PS
8/2/01	OK	OK	OK	OK	OK	5750L/9000L/1000L		PS
8/22/01	OK	OK	OK	OK	OK	350L		PS
8/24/01	OK	OK	OK	OK	OK	1050L/1000L		PS
8/26/01	OK	OK	OK	OK	OK	1450L/2000L		PS
8/27/01	OK	OK	OK	OK	OK	2150L/2000L/2000L		PS
8/28/01	OK	OK	OK	OK	OK	2950L/3000L/2000L		PS
8/29/01	OK	OK	OK	OK	OK	3150L/3000L/2000L		PS
8/30/01	OK	OK	OK	OK	OK	3850L/3000L/2000L		PS
8/31/01	OK	OK	OK	OK	OK	4350L/4000L/3000L		PS
9/1/01	OK	OK	OK	OK	OK	4950L/4000L/2000L		PS
9/2/01	OK	OK	OK	OK	OK	5750L/6000L/5000L	68	PS
9/3/01	OK	OK	OK	OK	OK	6350L/6000L/5000L	74	PS
9/4/01	OK	OK	OK	OK	OK	6550L/8000L/5000L	78	PS
9/5/01	OK	OK	OK	OK	OK	350L/1000L		PS
9/6/01	OK	OK	OK	OK	OK	1250L/1000L/1000L	14	PS
9/7/01	OK	OK	OK	OK	OK	2050L/1000L/1000L	20	PS
9/8/01	OK	OK	OK	OK	OK	2250L/2000L/2000L	26	PS
9/9/01	OK	OK	OK	OK	OK	2350L/2000L/2000L	29	PS
9/10/01	OK	OK	OK	OK	OK	3450L/2000L/1000L	38	PS
9/11/01	OK	OK	OK	OK	OK	3150L/3000L/2000L	39	PS
9/12/01	OK	OK	OK	OK	OK	4150L/4000L/1000L	49	PS
9/13/01	OK	OK	OK	OK	OK	0		PS
9/14/01	OK	OK	OK	OK	OK	1050L/1000L	11	PS
9/15/01	OK	OK	OK	OK	OK	1350L/1000L/1000L		PS
9/16/01	OK	OK	OK	OK	OK	1450L/1000L/1000L		PS
9/17/01	OK	OK	OK	OK	OK	2050L/1000L/1000L		PS
9/18/01	OK	OK	OK	OK	OK	2550L/1000L/1000L		PS
9/19/01	OK	OK	OK	OK	OK			PS
9/20/01	OK	OK	OK	OK	OK			PS
9/21/01	OK	OK	OK	OK	OK			PS
9/22/01	OK	OK	OK	OK	OK			PS
9/23/01	OK	OK	OK	OK	OK			PS
9/24/01	OK	OK	OK	OK	OK			PS
9/25/01	OK	OK	OK	OK	OK			PS
9/26/01	OK	OK	OK	OK	OK			PS
9/27/01	OK	OK	OK	OK	OK			PS
9/28/01	OK	OK	OK	OK	OK			PS
9/29/01	OK	OK	OK	OK	OK			PS
9/30/01	OK	OK	OK	OK	OK			PS
10/1/01	OK	OK	OK	OK	OK			PS
10/2/01	OK	OK	OK	OK	OK			PS
10/3/01	OK	OK	OK	OK	OK			PS
10/4/01	OK	OK	OK	OK	OK			PS
10/5/01	OK	OK	OK	OK	OK			PS
10/6/01	OK	OK	OK	OK	OK			PS
10/7/01	OK	OK	OK	OK	OK			PS
10/8/01	OK	OK	OK	OK	OK			PS
10/9/01	OK	OK	OK	OK	OK			PS
10/10/01	OK	OK	OK	OK	OK			PS
10/11/01	OK	OK	OK	OK	OK			PS
10/12/01	OK	OK	OK	OK	OK			PS
10/13/01	OK	OK	OK	OK	OK			PS
10/14/01	OK	OK	OK	OK	OK			PS
10/15/01	OK	OK	OK	OK	OK			PS
10/16/01	OK	OK	OK	OK	OK			PS
10/17/01	OK	OK	OK	OK	OK			PS
10/18/01	OK	OK	OK	OK	OK			PS
10/19/01	OK	OK	OK	OK	OK			PS
10/20/01	OK	OK	OK	OK	OK			PS
10/21/01	OK	OK	OK	OK	OK			PS
10/22/01	OK	OK	OK	OK	OK			PS
10/23/01	OK	OK	OK	OK	OK			PS
10/24/01	OK	OK	OK	OK	OK			PS
10/25/01	OK	OK	OK	OK	OK			PS
10/26/01	OK	OK	OK	OK	OK			PS
10/27/01	OK	OK	OK	OK	OK			PS
10/28/01	OK	OK	OK	OK	OK			PS
10/29/01	OK	OK	OK	OK	OK			PS
10/30/01	OK	OK	OK	OK	OK			PS
10/31/01	OK	OK	OK	OK	OK			PS
11/1/01	OK	OK	OK	OK	OK			PS
11/2/01	OK	OK	OK	OK	OK			PS
11/3/01	OK	OK	OK	OK	OK			PS
11/4/01	OK	OK	OK	OK	OK			PS
11/5/01	OK	OK	OK	OK	OK			PS
11/6/01	OK	OK	OK	OK	OK			PS
11/7/01	OK	OK	OK	OK	OK			PS
11/8/01	OK	OK	OK	OK	OK			PS
11/9/01	OK	OK	OK	OK	OK			PS
11/10/01	OK	OK	OK	OK	OK			PS
11/11/01	OK	OK	OK	OK	OK			PS
11/12/01	OK	OK	OK	OK	OK			PS
11/13/01	OK	OK	OK	OK	OK			PS
11/14/01	OK	OK	OK	OK	OK			PS
11/15/01	OK	OK	OK	OK	OK			PS
11/16/01	OK	OK	OK	OK	OK			PS
11/17/01	OK	OK	OK	OK	OK			PS
11/18/01	OK	OK	OK	OK	OK			PS
11/19/01	OK	OK	OK	OK	OK			PS
11/20/01	OK	OK	OK	OK	OK			PS
11/21/01	OK	OK	OK	OK	OK			PS
11/22/01	OK	OK	OK	OK	OK			PS
11/23/01	OK	OK	OK	OK	OK			PS
11/24/01	OK	OK	OK	OK	OK			PS
11/25/01	OK	OK	OK	OK	OK			PS
11/26/01	OK	OK	OK	OK	OK			PS
11/27/01	OK	OK	OK	OK	OK			PS
11/28/01	OK	OK	OK	OK	OK			PS
11/29/01	OK	OK	OK	OK	OK			PS
11/30/01	OK	OK	OK	OK	OK			PS
12/1/01	OK	OK	OK	OK	OK			PS
12/2/01	OK	OK	OK	OK	OK			PS
12/3/01	OK	OK	OK	OK	OK			PS
12/4/01	OK	OK	OK	OK	OK			PS
12/5/01	OK	OK	OK	OK	OK			PS
12/6/01	OK	OK	OK	OK	OK			PS
12/7/01	OK	OK	OK	OK	OK			PS
12/8/01	OK	OK	OK	OK	OK			PS
12/9/01	OK	OK	OK	OK	OK			PS
12/10/01	OK	OK	OK	OK	OK			PS
12/11/01	OK	OK	OK	OK	OK			PS
12/12/01	OK	OK	OK	OK	OK			PS
12/13/01	OK	OK	OK	OK	OK			PS
12/14/01	OK	OK	OK	OK	OK			PS
12/15/01	OK	OK	OK	OK	OK			PS
12/16/01	OK	OK	OK	OK	OK			PS
12/17/01	OK	OK	OK	OK	OK			PS
12/18/01	OK	OK	OK	OK	OK			PS
12/19/01	OK	OK	OK	OK	OK			PS
12/20/01	OK	OK	OK	OK	OK			PS
12/21/01	OK	OK	OK	OK	OK			PS
12/22/01	OK	OK	OK	OK	OK			PS
12/23/01	OK	OK	OK	OK	OK			PS
12/24/01	OK	OK	OK	OK	OK			PS
12/25/01	OK	OK	OK	OK	OK			PS
12/26/01	OK	OK	OK	OK	OK			PS
12/27/01	OK	OK	OK	OK	OK			PS
12/28/01	OK	OK	OK	OK	OK			PS
12/29/01	OK	OK	OK	OK	OK			PS
12/30/01	OK	OK	OK	OK	OK			PS
12/31/01	OK	OK	OK	OK	OK			PS





WASTE MANAGEMENT DIVISION  
MICHIGAN DEPARTMENT OF  
ENVIRONMENTAL QUALITY

GENERAL INSTRUCTIONS

DO NOT WRITE IN THESE SPACES

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS  
WASTE MANIFEST

1. Generator's US EPA ID No. **08D056487101**  
Manifest Document No. **000000**

2. Page 1 of 1 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address  
**DYNAGRAPHICS, INC**  
**BEECH & ROBERTSON**  
**ATTN: LONNIE GRAYSON**  
**CINCINNATI, OH 45212**  
**513 396-3627**

A. State Manifest Document Number  
**MI 8215397**

4. Generator's Phone ( )  
5. Transporter 1 Company Name  
**ASHLAND DISTRIBUTION CO.**

B. State Generator's ID

C. State Transporter's ID

6. US EPA ID Number  
**08D074700311**

D. Transporter's Phone ( )  
**(937) 298-2410**

7. Transporter 2 Company Name  
**NORTHU INC.**

E. State Transporter's ID

F. Transporter's Phone ( )  
**(313) 524-5840**

8. US EPA ID Number  
**MI D021007275**

9. Designated Facility Name and Site Address  
**PETRO-CHEM PROCESSING INC**  
**421 LYCASTE**  
**DETROIT, MI 48214**

G. State Facility's ID

H. Facility's Phone ( )  
**(313) 524-5840**

10. US EPA ID Number  
**MI D900613200**

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <b>RM WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, METHYL ETHYL KETONE) 3, UN1993, PGII (D001, D033, F003, F005, D005) 05-5713 PETRO #NF063510</b>	<b>008</b>	<b>D R</b>	<b>03740</b>	<b>g</b>	<b>0001</b>
b. <b>RM WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE, ETHYL ALCOHOL) 3, UN1993, PGII (D001, F003, F005, D005) 05-5714 #NF063510</b>	<b>009</b>	<b>D R</b>	<b>0495</b>	<b>g</b>	<b>0001</b>
c. <b>RM WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (AROMATIC DISTILLATES, ALIPHATIC DISTILLATES) 1, UN1325 PGII (D001, D033, D005, F003, F005)</b>	<b>006</b>	<b>D R</b>	<b>01200</b>	<b>g</b>	<b>0001</b>
d.					

J. Additional Descriptions for Materials Listed Above  
a. (EPA Cont. #D003, F005, D035)  
b. (EPA Cont. #D035, F003, F005, D005)  
c. (EPA Cont. #D035, D005, F003, F005) **ASH 05-6038 PETRO #NF074771**

K. Handling Codes  
a. **0001**  
b. **0001**  
c. **0001**

15. Special Handling Instructions and Additional Information  
**EMERGENCY RESPONSE CALL "1-800-ASHLAND"**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  
Printed/Typed Name **Lonnie Grayson** Signature **Lonnie Grayson** Date **05/14/01**

17. Transporter 1 Acknowledgement of Receipt of Materials  
Printed/Typed Name **Gregory A. Johnson** Signature **Gregory A. Johnson** Date **05/15/01**

18. Transporter 2 Acknowledgement of Receipt of Materials  
Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

19. Discrepancy Indication Space  
ADDRESS ALL MDEO COPIES TO:  
WASTE MANAGEMENT DIVISION  
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
PO BOX 30000  
LANSING, MI 48206

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.  
Printed/Typed Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

THIS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4708 OR OUT OF STATE AT 313-373-7800 AND THE NATIONAL RESPONSE CENTER AT 1-800-224-7000 24 HOURS PER DAY.

FOR FILE



UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. 08D056487101  
Manifest Document No. 00080

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address  
DINAGRAPHS, INC  
BEECH & ROBERTSON  
CINCINNATI, OH 45212  
ATTN: LONNIE GRAYSON  
513 396-3627

4. Generator's Phone

5. Transporter 1 Company Name  
ASHLAND DISTRIBUTION CO.

6. US EPA ID Number  
08D074700311

7. Transporter 2 Company Name  
NORTRU, INC.

8. US EPA ID Number  
MID021087275

9. Designated Facility Name and Site Address  
PETRO-CHEM PROCESSING INC  
421 LYCASTE  
DETROIT, MI 48214

10. US EPA ID Number  
MID980615298

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)  
a. X RG WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, METHYL ETHYL KETONE) 3, UN1993, PGII (D001, D035, F003, F005, D005) 05-5713 PETRO #MF063518  
b. X RG WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE, ETHYL ALCOHOL) 3, UN1993, PGIII (D001, F003, F005, D035) 05-5714 #MF63519  
c. X RG WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (AROMATIC DISTILLATES, ALIPHATIC DISTILLATES) 4.1 UN1325 PGII (D001, D035, D003, F003, F005)  
d. D05-1052-01  
J. Additional Descriptions for Materials Listed Above  
b. (EPA Cont. #F003, F005, D035)  
a. (EPA Cont. #D035, F003, F005, D005)  
c. (EPA Cont. #D035, D005, F003, F005) ASH 05-6030 PETRO #MF074771  
15. Special Handling Instructions and Additional Information  
EMERGENCY RESPONSE CALL "1-800-ASHLAND"  
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulation: If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.  
17. Transporter 1 Acknowledgement of Receipt of Materials  
Printed/Typed Name Doug Callahan  
Signature [Signature]  
Date 05/16/01  
18. Transporter 2 Acknowledgement of Receipt of Materials  
Printed/Typed Name [Signature]  
Signature [Signature]  
Date 05/16/01  
19. Discrepancy Indication Space  
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  
Printed/Typed Name [Signature]  
Signature [Signature]  
Date 05/16/01



Required for all Hazardous wastes identified in 40CFR Part 261

Refer to Treatment Standards in 40 268.40

Generator Name: Dinagraphics, Inc Manifest No. MI 8215397

Manifest Line Item No. A PreQual No. WF63518 (ASH 05-5713) NWW X WW

EPA Waste Code(s) & Subcategories: D001 High TOC Ignitable Characteristic Liquids, D035, F003, F005, D005

Attachment 1 - EPA Waste Code Listing is being submitted with this notification unless listed above.

**Waste Constituent Notification(s):**

Attachment 2 - Waste Constituent Notification is being submitted with this notification unless listed above.

Manifest Line Item No. B PreQual No. WL63519 (ASH 05-5714) NWWW X WWW

EPA Waste Code(s) & Subcategories: D001 High TOC Ignitable Characteristic Liquids, D035, F003, F005

Attachment 1 - EPA Waste Code Listing is being submitted with this notification unless listed above.

**Waste Constituent Notification(s):**

Attachment 2 - Waste Constituent Notification is being submitted with this notification unless listed above.

Manifest Line Item No. C PreQual No. WF074771 (ASH 05-6038) NWW X WW

EPA Waste Code(s) & Subcategories: D001 High TOC Ignitable Characteristic Liquids, D035, D005, F003, F005

Attachment 1 - EPA Waste Code Listing is being submitted with this notification unless listed above.

**Waste Constituent Notification(s):**

Attachment 2 - Waste Constituent Notification is being submitted with this notification unless listed above.

Manifest Line Item No. \_\_\_\_\_ PreQual No. \_\_\_\_\_ NWW WW

EPA Waste Code(s) & Subcategories:

Attachment 1 - EPA Waste Code Listing is being submitted with this notification unless listed above.

**Waste Constituent Notification(s):**

Attachment 2 - Waste Constituent Notification is being submitted with this notification unless listed above.

D001	High TOC Ignitable Characteristic Liquids	K006	Anhydrous Chrome Oxide Pigment WW Treatment Sludge
	Ignitable Characteristic Wastes		Hydrated Chrome Oxide Pigment WW Treatment Sludge
D002	All corrosives, managed in non-CWA systems	K069	Calcium Sulfate (Low Lead)
	All corrosives, managed in CWA systems		Non-Calcium Sulfate (High Lead)
D003	Reactive Sulfides or Reactive Cyanides	K071	RMERC Residues
	Water Reactives or Other Reactives		Non-REMERC Residues
D006	Cadmium Containing Batteries or Cadmium Characteristic Wastes		K071 Wastewaters
D008	Lead Acid Batteries or Lead Characteristic Wastes	K106	High Mercury Non Wastewaters >260 mg/kg total Mercury
D009	High Mercury - Organic or Inorganic		RMERC Residues Non Wastewaters <260 mg/kg total Mercury
F025	Light Ends Subcategory		Other K106 Nonwastewaters <260 mg/kg not RMERC residues
	Spent Filters/Aids and Desiccants		K106 Wastewaters
U151	High Mercury NWWs >260 mg/kg Total Mercury	P047	4,6 Dinitro-o-Cresol or 4,6 Dinitro-o-Cresol Salts
	Low Mercury NWWs <260 TM & RMERC Residue	U240	2,4 - D
	Mercury Wastewaters All		2,4 - D Salts and esters

WASTE CONSTITUENT NOTIFICATION is required for: D001 (other than liquid >10% TOC, if not combusted), D002, D003R, D003OR, D003RS, D003WR, D004-D043, F001-F005, F039

DEC 10 1997 7 06



WASTE MANAGEMENT DIVISION  
MICHIGAN DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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Required under authority of Part 111 and  
Part 121 of Act 451, 1994, as amended.  
Failure to file may subject you to  
criminal and/or civil penalties under  
Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved OMB No. 2050-0039

THIS FORM IS TO BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <b>0 H D 0 5 6 4 8 7 1 0 1</b>	Manifest Document No. <b>60085</b>	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address <b>DINAGRAPHS, INC BEECH &amp; ROBERTSON ATTN: LONNIE GRAYSON CINCINNATI, OH 45212</b>		4. Generator's Phone ( <b>513</b> ) <b>396-5627</b>		A. State Manifest Document Number <b>MI 8215236</b>	
5. Transporter 1 Company Name <b>ASHLAND DISTRIBUTION CO.</b>		6. US EPA ID Number <b>0 H D 0 7 4 7 0 0 3 1 1</b>		B. State Generator's ID	
7. Transporter 2 Company Name <b>MORTRU INC.</b>		8. US EPA ID Number <b>M I D 0 2 1 0 8 7 2 7 5</b>		C. State Transporter's ID	
9. Designated Facility Name and Site Address <b>PETRO-CHEM PROCESSING INC 421 LYCASTE DETROIT, MI 48214</b>		10. US EPA ID Number <b>M I D 9 8 0 6 1 5 2 9 8</b>		D. Transporter's Phone ( <b>937</b> ) <b>298-2818</b>	
				E. State Transporter's ID	
				F. Transporter's Phone ( <b>313</b> ) <b>824-5840</b>	
				G. State Facility's ID	
				H. Facility's Phone ( <b>313</b> ) <b>824-5840</b>	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. <b>X</b> <b>RG WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, METHYL ETHYL KETONE) 3, UN1993, PGII (D001, D035, F003, F005, D005) 05-5713 PETRO #WF663518</b>		<b>076 D 104180 G</b>			<b>D001</b>
b. <b>X</b> <b>RG WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE, ETHYL ALCOHOL) 3, UN1993, PGIII (D001, F003, F005, D035) 05-5714 #WL63519</b>		<b>008 D 100440 G</b>			<b>D001</b>
c. <b>X</b> <b>RG WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (AROMATIC DISTILLATES, ALIPHATIC DISTILLATES) 4.1 UN1325 PGII (D001, D035, D005, F003, F005)</b>		<b>004 D 100800 P</b>			<b>D001</b>
d. <b>D03-322-01</b>					
J. Additional Descriptions for Materials Listed Above					
b. (EPA Cont.: F003, F005, D035) a. (EPA Cont.: D035, F003, F005, D005) c. (EPA Cont.: D035, D005, F003, F005) <b>ASH 05-6038 PETRO #WF674771</b>					
15. Special Handling Instructions and Additional Information <b>EMERGENCY RESPONSE CALL "1-800-ASHLAND"</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name <b>Lonnie Grayson</b>		Signature <i>[Signature]</i>		Date <b>03/05/97</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>[Signature]</i>		Date <b>03/05/97</b>	
Printed/Typed Name <b>Brent Day</b>		Signature <i>[Signature]</i>		Date <b>03/05/97</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature <i>[Signature]</i>		Date <b>03/05/97</b>	
Printed/Typed Name <b>Steve Tarrant</b>		Signature <i>[Signature]</i>		Date <b>03/05/97</b>	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name <b>N. Enright</b>		Signature <i>[Signature]</i>		Date <b>03/09/97</b>	



WASTE MANAGEMENT DIVISION  
MICHIGAN DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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Form Approved. OMB No. 2050-0039

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4. Generator's Phone ( <b>513</b> ) <b>396-5627</b>				B. State Generator's ID	
5. Transporter 1 Company Name <b>ASHLAND DISTRIBUTION CO.</b>		6. US EPA ID Number <b>OH D 0 7 4 7 0 0 3 1 1</b>		C. State Transporter's ID	
7. Transporter 2 Company Name <b>NORTRU INC.</b>		8. US EPA ID Number <b>MI D 0 2 1 0 8 7 2 7 5</b>		D. Transporter's Phone ( <b>937</b> ) <b>298-2818</b>	
9. Designated Facility Name and Site Address <b>PETRO-CHEM PROCESSING INC 421 LYCASTE DETROIT, MI 48214</b>		10. US EPA ID Number <b>MI D 9 8 0 6 1 5 2 9 8</b>		E. State Transporter's ID	
				F. Transporter's Phone ( <b>313</b> ) <b>824-5844</b>	
				G. State Facility's ID	
				H. Facility's Phone ( <b>313</b> ) <b>824-5848</b>	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	<b>X</b> <b>RD WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, METHYL ETHYL KETONE) 3, UN1993, PGII (D001, D035, F003, F005, D005) 05-5713 PETRO #WF063518</b>	<b>076</b>	<b>D 04180</b>	<b>G</b>	<b>D 0 0 1</b>
b.	<b>X</b> <b>RD WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE, ETHYL ALCOHOL) 3, UN1993, PGIII (D001, F003, F005, D035) 05-5714 #WL63519</b>	<b>008</b>	<b>D 000 440</b>	<b>G</b>	<b>D 0 0 1</b>
c.	<b>X</b> <b>RD WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (AROMATIC DISTILLATES, ALIPHATIC DISTILLATES) 4.1 UN1325 PGII (D001, D035, D005, F003, F005)</b>	<b>004</b>	<b>D 000800</b>	<b>P</b>	<b>D 0 0 1</b>
d.					
J. Additional Descriptions for Materials Listed Above					
b. (EPA Cont. #F003, F005, D035)					
c. (EPA Cont. #D035, F003, F005, D005)					
d. (EPA Cont. #D035, D005, F003, F005) <b>ASH 05-6838 PETRO #WF074771</b>					
K. Handling Code a <b>H 0 6</b> b <b>H 0 6</b> c <b>H 0 6</b> d					
15. Special Handling Instructions and Additional Information <b>EMERGENCY RESPONSE CALL "1-800-ASHLAND"</b>					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. <b>D. J. Schmitt, Jr. Small Quantity Generator (SQG)</b>					
Printed/Typed Name <b>D. J. Schmitt, Jr.</b>		Signature <i>[Signature]</i>		Date <b>03/05/01</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name <b>Brent Day</b>		Signature <i>[Signature]</i>		Date <b>03/05/01</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Date	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name		Signature		Date	

ALL INFORMATION MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

Required for all Hazardous wastes identified in 40CFR Part 261  
Refer to Treatment Standards in 40 CFR 268.40

Generator Name: Dinagraphics, Inc Manifest No. MI 8215236

Manifest Line Item No. \_\_\_\_\_ PreQual No. \_\_\_\_\_ NWW \_\_\_\_ WW \_\_\_\_

EPA Waste Code(s) & Subcategories: \_\_\_\_\_

Attachment 1 - EPA Waste Code Listing is being submitted with this notification unless listed above.

Waste Constituent Notification(s): \_\_\_\_\_

Attachment 2 - Waste Constituent Notification is being submitted with this notification unless listed above.

D001	High TOC Ignitable Characteristic Liquids	K006	Anhydrous Chrome Oxide Pigment WW Treatment Sludge
	Ignitable Characteristic Wastes		Hydrated Chrome Oxide Pigment WW Treatment Sludge
D002	All corrosives, managed in non-CWA systems	K069	Calcium Sulfate (Low Lead)
	All corrosives, managed in CWA systems		Non-Calcium Sulfate (High Lead)
D003	Reactive Sulfides or Reactive Cyanides	K071	RMERC Residues
	Water Reactives or Other Reactives		Non-REMERC Residues
D006	Cadmium Containing Batteries or Cadmium Characteristic Wastes		K071 Wastewaters
D008	Lead Acid Batteries or Lead Characteristic Wastes	K106	High Mercury Non Wastewaters >260 mg/kg total Mercury
D009	High Mercury - Organic or Inorganic		RMERC Residues Non Wastewaters <260 mg/kg total Mercury
F025	Light Ends Subcategory		Other K106 Nonwastewaters <260 mg/kg not RMERC residues
	Spent Filters/Aids and Desiccants		K106 Wastewaters
U151	High Mercury NWWs >260 mg/kg Total Mercury	P047	4,6 Dinitro-o-Cresol or 4,6 Dinitro-p-Cresol Salts
	Low Mercury NWWs <260 TM & RMERC Residue	U240	2,4 - D
	Mercury Wastewaters All		2,4 - D Salts and esters

WASTE CONSTITUENT NOTIFICATION is required for: D001 (other than liquid >10% TOC, if not combusted), D002, D003R, D003OR, D003RS, D003WR, D004-D043, F001-F005, F039

MAIN TOPIC: Resource Conservation Recovery Act, Intergrated Contingency PROGRAM

OTHER TOPIC: \_\_\_\_\_

DI-NA-CAL Label Group Norwood Plant certifies that the following signed employees have received Hazardous

DATE:08/09-10/01

Anderson	Jenny	<i>Jenny Anderson</i>
Ashorn	Robert	
Baker	Robert	
Ballman	Brian	
Bauer	Gary	
Binkley	Donna	
Blevins	Philip	
Borgemenke	Daniel	<i>Daniel Borgemenke</i>
Brown	Tamara	
Burton	Samuel	<i>Sam Burton</i>
Burwick	Daniel	<i>Dan Burwick</i>
Byrd	Danny	
Campbell	Leonard	
Chadwell	Connie	
Check	Carolyn	
Coffey	Steven	<i>Steve Coffey</i>
Colson	Gary	<i>Gary Colson</i>
Conley	Scott	<i>Scott Conley</i>
Conner	Lanna	
Cook	Dallas	<i>Dallas Cook</i>
Cook	Melanie	
Cooper	Douglas	
Cooper	Floyd	<i>Floyd Cooper</i>
Cooper	Jerry	
Cooper	Philip	<i>Phil Cooper</i>
Crotty	Lisa	
Crump	Chryll	<i>Chryll Crump</i>
Cunningham	John	
Dennis	Marty	
Downey	Robert	
Edrington	Wanda	
Ense	Bruce	
Ferguson	James	<i>J. Ferguson</i>
Flischel	Michael	<i>Michael Flischel</i>
Foley	Michael	<i>Michael Foley</i>
Freeman	Susan	<i>Susan Freeman</i>
Frey	John	<i>John B. Frey</i>

Fuller	Kenneth
Gaffney	John
Glaser	Marilynn
Grayson	Lonnie
Grohs	Carl <i>Carl Grohs</i>
Hagaman	Steven
Harper	Donna <i>Donna J. Harper</i>
Haverland	Sharon
Herbe	Dave <i>Dave Habe</i>
Higgs	Tina
Hines	Donald
Hipp	Steven
Hutchinson	David
Jacobs	Glenn
Jones	Fred
Kessler	Leonard
Kimble	Gregory <i>Greg Kimble</i>
Kim	Mark
Kisker	Dave
Knepper Jr.	Richard <i>Richard Knepper</i>
Kuykendall	Jeffrey
Laflin	William <i>Bill Laflin</i>
Lerman	Rick
Liebert	John
Martin	Leslie
Mattson	Patricia
McCulley	Diana
McGuire	John
McKoy	Butch
McWilliams	Marnike <i>Marnike McWilliams</i>
McWilliams	Luther <i>L. McWilliams</i>
Mills	Daniel <i>Danny Mills</i>
Mourer	Bill <i>Bill Mourer</i>
Myrick	Michael
Ogden	William <i>BM Ogden</i>
Olgee	Tom
Painter	J. Dave <i>D. Painter</i>
Patrick	Charles
Patterson	Yvonne
Patton	Carolyn <i>Patton Carolyn</i>
Reynolds	Oscar
Reynolds	William <i>Bill Reynolds</i>
Rogers	Carl <i>Carl Rogers</i>
Rogers	Teresa <i>Teresa Rogers</i>

Rolfes	Thomas	<i>Thomas Rolfes</i>
Ruggles	June	<i>June Ruggles</i>
Scott	Jackie	<i>Jackie Scott</i>
Sensel	Robert	<i>Robert Sensel</i>
Shanks	Andre	
Skiba	Terry	
Spivey	Bill	<i>George Stevens</i>
Stevens	George	
Stockwell	Amie	
Sunderhaus	Andrew	<i>Andrew Sunderhaus</i>
Swisher	Jim	
Throckmorton	Larry	
Thurmond	Rodney	
Urlage	Judy	
Van Bever	Mo	
Von Hagel	Tom	
Voorhees	Don	
Wade	Harold	
Wagner	Robert	
Wainscott	Sandy	
Walker	James	<i>James Walker</i>
Wall	Debby	
Wall	Robert	
Walley	William	<i>William Walley</i>
Walters	Daniel	<i>Dan Walters</i>
Wiehoff	Gregory	<i>Meg Wiehoff</i>
Wilcox	John	<i>John Wilcox</i>
Williams	Cynthia	
Wood	Benjamin	
Woodrum	Ron	<i>Ron Woodrum</i>
Woster	Fatima	<i>Fatima Woster</i>
Yee	Iggy	
Yelton	Karen	
Yorio	Matt	
Zutterling	Sandy	

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# Schedule April 8th-14th

## Gravure

101	THIRD	FIRST	SECOND
PRESS 101			
CREW LEADER	WALLEY-12-KNEPPER	R. KNEPPER-12	WALLEY-12
ASST. CREW LDR.	D. COOPER	D. WALTERS	G. STEVENS
CREW MEMBER	D. BURWICK	C. CHADWELL	G. WIEHOFF
CREW MEMBER	L. CAMPBELL	WILCOX	M. MYRICK
Third Floor			
PRESSMAN		CRUMP	BORGENMENKE
ASST. PRESSMAN		BYRD	K. FULLER
HELPER		CONLEY	P. COOPER
ROLLTENDER		R. MARTIN	G. BAUER
PRE-MAKE READY TEAMS			
INK	D. COOK	A. SUNDERHAUS (J. FREY-TRAIN)	WALKER
CYLINDERS		D. MILLS	C. GROHS
PMR UTILITY	M. FLISCHEL	REYNOLDS	D. HINES <i>John Cunningham</i>
ASSEMBLER 1ST	B. ASHORN	L. MCWILLIAMS	M. FOLEY
ASSEMBLER 3RD	A. SHANKS (EXTRA)	J. FERGUSON	T. ROLFES
Finishing			
	THIRD	FIRST	SECOND
Slitting			
SR71	J. LIEBERT	F. GLANCY	R. BAKER
FLOATER	P. WADE	G. KIMBLE	B. OGDEN
OTHER SLITTERS		M. LAFLIN-TRAIN (HUTCHINSON)	
Inspectors			
301	D. HARPER	M. MCWILLIAMS	F. WOSTER
302		J. ANDERSON	J. RUGGLES
303			
304			
SHIP/PER PACKER			
PACKER	HAVERLAND	B. WOOD	S. FREEMAN
PORTER	J. SMITH	R. THURMOND	J. CUNNINGHAM
SHIPPING	T. BROWN	VANBEVER	C. PATTON
MAINTENANCE	COLSON, PAINTER	R. WAGNER, WALL	
		S. BURTON, REYNOLDS	
VACATION GRAVURE			
VACATION FINISHING			



State of Ohio Environmental Protection Agency

Southwest District Office

*Smurfit  
Di-na-cal  
Corp.*

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

Bob Taft, Governor  
Maureen O'Connor, Lt. Governor  
Christopher Jones, Director

April 19, 2002

Mr. Lonnie Grayson  
Smurfit Stone, Di-na-cal Label Group  
4500 Beech Street  
Cincinnati, Ohio 45212

Dear Mr. Grayson:

Thank you for accompanying me during Ohio EPA's April 10, 2002, inspection of Smurfit-Stone, Di-na-cal Label Group at 4500 Beech Street in Cincinnati, Ohio. The generator identification number is OHD056487101.

Ohio EPA inspected the facility to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). This letter will explain the violations we found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to our general concerns and the pollution prevention opportunities we discussed. Enclosed for your records is a copy of a completed inspection checklist.

**Background**

The facility prints labels for heat transfer application. Smurfit Stone, Di-na-cal Label Group, uses solvents in cleanup processes and generates waste ink in the operations. These processes generate the majority of your hazardous waste. An oil separator is also utilized, and used oil is taken off-site.

**Violations**

The following violations of Ohio's hazardous waste laws were identified:

**1. Management of containers**

OAC 3745-66-73 (A) requires that the containers always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, the filter drum on the first floor satellite area was open without a lid. A second drum in that area did not have the bung rim properly closed. As such, Smurfit Stone, Di-na-cal Label Group, was in violation of OAC 3745-66-(A).

Upon discovery of the drums during my inspection, employees were notified and the drums were then closed. As such, your facility returned to compliance with this requirement.

**2. Annual review of personnel training**

According to OAC 3745-65-16(C), employees must take part in an annual review of the initial training.

Although you do have a program on RCRA training, documentation of the past training revealed that some key personnel handling hazardous waste had not been given an annual refresher. Specifically, during my inspection I found that David Hutchinson was one of the key hazardous waste personnel in 2001, and he had not attended the refresher course. Therefore, Smurfit Stone, Di-na-cal Label Group is in violation of the annual review requirement stated in OAC 3745-65-16(C).

To return to compliance, Smurfit Stone, Di-na-cal Label Group must ensure that an annual review of the initial training is given to employees. You stated that training was to commence April 11-12, 2002. Fax or send a copy of the roster for the training and a work schedule roster for the current set up crew for your facility by **April 30, 2002.**

**3. Hazardous waste storage weekly inspections**

According to OAC 3745-66-74, the owner or operator shall inspect the facility on a weekly basis for leaks and deterioration. The owner shall keep a log or summary of these inspections.

Smurfit Stone, Di-na-cal Label Group, did have a log showing weekly inspections of the storage areas. However, according to the log summary of the inspections, inspections were missed during June 11 - June 30 and the weeks of August 13 and August 28, 2001. Therefore, Smurfit Stone, Di-na-cal Label Group was in violation OAC 3745-66-74 during that time period.

Smurfit Stone, Di-na-cal Label Group has already returned to compliance on this issue as documentation of current ongoing inspections was available for the facility.

**General Concerns**

Your facility was not in compliance with OAC 3745-65-16 at the time of the inspection. Since shifts and responsibilities at the facility change frequently, it would be beneficial for your company to establish a way for anyone who is eligible for the shift which handles hazardous waste to attend the annual refresher training. You could also establish the training as a requirement prior to switching shifts. As a reminder, the initial training must be completed in six months for a new hire or someone in a new position in order to comply with OAC 3745-65-16 (B).

As you reported, your facility was not in compliance of OAC 3745-66-74 during several weeks in 2001 because Mr. Lerman had acquired additional job duties at that time which prevented him from performing the inspections. It is suggested that someone be assigned as a back up for conducting inspections so that the task is covered each week.

Mr. Lonnie Grayson  
Smurfit Stone, Di-na-cal Label Group  
Page 3

During the inspection, we discussed recent regulation changes. I have enclosed two sections in particular that we had discussed. There is no longer a regulatory requirement to include waste codes on the manifests at the time of shipment, per OAC 3745-54-20 (A). Although it is not a specific requirement in the regulations, Ohio EPA suggests that the waste codes still be included on waste manifests. Also, in regard to land disposal restrictions(LDR), OAC 3745-270-07(A)(3)(a) states a one-time written notice is required. Therefore, it is not necessary to include an LDR form with each shipment. One is needed if a new waste stream is created.

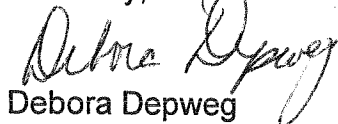
**Pollution prevention**

We did discuss the concept of pollution prevention during the inspection. Newer equipment installed on the first floor allows for more precise application of the inks and laquer which will reduce the amount of materials used and wasted. Changes in the equipment have also allowed for less ink to be left at the end of a run. By working with the ink suppliers using new computer programs as you intend to do, the amount of ink reworked may also be improved.

Smurfit Stone, Di-na-cal Label Group purchased a distiller approximately five years ago. This reduced the amount of solvent that was sent out for disposal. Metal pails have been emptied and crushed prior to recycling. Continual changes have allowed your company to work toward waste reduction. Your company has gathered a work team to specifically evaluate new opportunities to become more efficient in your operations. Ohio EPA encourages you to continue to investigate and follow through when applicable on pollution prevention projects.

If you have questions or comments after reviewing this letter and the supplemental information we provided, please contact me at 937-285-6080.

Sincerely,



Debora Depweg  
Division of Hazardous Waste Management

Enclosures

cc: Tammy McConnell, CO  
File

DD/sm

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

# RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Smurfit Stone, Dineal Label Group EPA ID#: OH D056 487101  
 Street: 4500 Beech St. City: Norwood OH / Cincinnati  
 County: Hamilton State: Ohio Zip: 45212-0000  
 Mailing Address: Same  
 (If different from above)  
 Telephone: 513-396-5627 Fax #: 513-396-5615  
 Owner/Operator: Smurfit Stone  
 (If different from above)  
 Street: \_\_\_\_\_  
 City: \_\_\_\_\_ State: Ohio Zip: \_\_\_\_\_  
 Inspection Date(s): April 10, 2002 Time(s): 10:37am to 2:00 pm  
 Inspection Announced? Yes ☒ NO If so, how much advance notice given? N/A

Name	Affiliation	Telephone
Inspectors: <u>Debora Depweg</u>	<u>Ohio EPA</u>	<u>937-285-6080</u>
Facility Representative: <u>Lonnie Grayson, Division Plant Engineer</u>	<u>513-396-5627</u>	
<u>ext meeting David Kisker, Plant Manager</u>		
<u>A.T. Skiba, General Manager</u>		

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

## POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ☒ No ☐ N/A ☐ RMK# ☐

a. **If so**, what has the company done to minimize hazardous waste generation?

- ☒ A change in the process resulting in less waste.
- ☐ A change in the product resulting in less waste.
- ☒ Use of fewer and less toxic hazardous raw materials.
- ☒ Better operations/improved housekeeping.
- ☒ On-site recycling/reuse of hazardous materials.
- ☒ Sending waste off-site for recycling/reuse.
- ☐ Other activities (specify): \_\_\_\_\_

b. **If so**, what hazardous wastes have been addressed?

- ☒ Solvents
- ☐ Paint related wastes

- ☒ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☒ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☐ Fluorescent light bulbs
- ☐ Used batteries
- ☐ Shop rags
- ☐ Other (specify): \_\_\_\_\_

c. **If not**, why hasn't the company considered P2?

- ☐ The company just never thought about it
- ☐ Lack of information about practical alternatives
- ☐ Lack of capital to make process changes
- ☐ Lack of internal management support
- ☐ The company does not generate enough hazardous waste to consider P2
- ☐ Other reason given (specify): \_\_\_\_\_

2. Does the company plan to do P2 activities in the future? Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Did you give the company information about P2 during the inspection? Yes ☐ No ☒ N/A ☐ RMK# ☐
5. Would the company like a P2 assessment? Yes ☐ No ☒ N/A ☐ RMK# ☐

**If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the *Pollution Prevention Assessments for Hazardous Waste Generators* document and discuss it with them.**

6. If the company does not want a P2 assessment, why not?

*They have a team of 7 who routinely meet & assess waste mgt - P2 needs*

**REMARKS**

## LARGE QUANTITY GENERATOR REQUIREMENTS

### GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Has the generator obtained an identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41] Yes ☐ No ☒ N/A ☐ RMK# ☐ 1

### WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so:
- a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. Are export related documents being maintained on-site? [3745-52-57] Yes ☒ No ☐ N/A ☐ RMK# ☐

### GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so:
- a. Describe the unit(s) which the generator has closed.
- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐



- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

**NOTE:** *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

**REMARKS**

① Awaiting electronic submittal via software

## MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes ☒ No ☐

If the answer is no, show them what the statement says using a signed manifest.

**NOTE:** While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☒ No ☐ N/A ☒ RMK# ☐

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐

- b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes ☒ No ☐ N/A \_\_\_ RMK# \_\_\_

### REMARKS

## PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ☒ No ☐ N/A ☐ RMK# 1
  - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ☒ No ☐ N/A ☐ RMK# 1

**NOTE:** *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Emergency equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Emergency systems? Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐

- b. Key parameters for automatic waste feed cut-off systems? Yes ☒ No ☐ N/A ☒ RMK#
- c. Communication or alarm system? Yes ☒ No ☐ N/A ☐ RMK#
- d. Response procedures for fire/explosions? Yes ☒ No ☐ N/A ☐ RMK#
- e. Response to groundwater contamination incidents? Yes ☒ No ☐ N/A ☐ RMK#
- f. Shutdown procedures? Yes ☐ No ☐ N/A ☒ RMK#
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK#
6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☐ No ☒ N/A ☐ RMK#
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☒ No ☐ N/A ☐ RMK#
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK#
9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK#
10. **Optional:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

**Job Performed**

**Name of Employee**

**Date(s) Trained**

Setup

Dave Hutchinson

**REMARKS**

① Since job change for some employees the pre-made ready team sometimes did not have the training 4 in a year. Specifically D. Hutchinson did more training.

② Have 2 different programs setup staff

## CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]*

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ☒ No ☐ N/A ☐ RMK# ☐

## EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes\_\_\_ No ☒ N/A \_\_\_ RMK#\_\_\_
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes \_\_\_ No ☐ N/A ☒ RMK#\_\_\_

**NOTE:** OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

#### REMARKS

## PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐ RMK# ☐
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Emergency communication device? Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Portable fire control, spill control and decon equipment? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Water of adequate volume/pressure? Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes ☒ No ☐ N/A ☐ RMK# ☐
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ☐ No ☐ N/A ☒ RMK# ☐

### REMARKS



## GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes ☐ No ☒ N/A ☐ RMK# ☐

## SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Are under the control of the operator of the process generating the waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - c. Do not exceed a total of 55 gallons of hazardous waste? *per stream* Yes ☒ No ☐ N/A ☐ RMK# ☐
  - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ☐ No ☐ N/A ☒ RMK# ☐
  - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ☒ No ☐ N/A ☐ RMK# ☐

**NOTE:** *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ☒ No ☐ N/A ☐ RMK# ☐
  - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ☐ No ☐ N/A ☒ RMK# ☐

## USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐ RMK# ☐

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☐ N/A ☐ RMK# ☐
- b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist) Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐ RMK# ☐
8. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes ☒ No ☐ N/A ☐ RMK# ☐

#### PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐ RMK# ☐

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#### REMARKS

① Some weeks were missed due to employee having to take on additional job duties.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Page 14 of 14

3/2002

LQG1.3.2002.wpd

## PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_  
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)] Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes ☐ No ☒ N/A \_\_\_ RMK# \_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_

## USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)] Yes ☒ No ☐ N/A \_\_\_ RMK# \_\_\_
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes ☒ No ☐ N/A \_\_\_ RMK# \_\_\_
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ☒ No ☐ N/A \_\_\_ RMK# \_\_\_
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
- b. Contained the release? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
- c. Cleaned up and properly managed the used oil and other materials? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No ☐ N/A ☒ RMK# \_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No ☒ N/A \_\_\_ RMK# \_\_\_

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes ☐ No ☐ N/A ☒ RMK# ☐

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes ☐ No ☐ N/A ☒ RMK# ☐

c. Are the combustion gases from heater vented to the ambient air?

Yes ☐ No ☐ N/A ☒ RMK# ☐

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes ☒ No ☐ N/A ☐ RMK# ☐

### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes ☐ No ☐ N/A ☐ RMK# ☐

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes ☐ No ☐ N/A ☐ RMK# ☐

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes ☐ No ☐ N/A ☐ RMK# ☐

### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes ☐ No ☐ N/A ☐ RMK# ☐

### REMARKS



**DI-NA-CAL® Label Group**  
*Internal Correspondence*

*Date:* April 11, 2002

*To:* Plant wide

*Location:*

*From:* Lonnie C. Grayson

*Location:*

*Subject:* RCRA Training, waste handling

*cc:*

**Please follow these steps when accumulating the hazardous waste.**

1. Place the empty drum in the satellite location
2. Spray paint over all labels and other identification marks on the drum. This includes the red fire label with the wording "ink" on it.
3. Affix the hazardous waste label to the drum
4. Affix the red fire label with the number 3 on it to the drum
5. Place the lid on the drum and install the new quick release drum ring onto the drum
6. Attach the static grounding cable to the drum lid

**After the drum is full of hazardous waste**

1. Remove the temporary quick release drum ring
2. Install the permanent drum ring with the bolts facing downward
3. Check the drum over for proper labeling
4. Check the drum over for any potential leakage

5. Put the current date in the space provided on the hazardous waste label marked “accumulation date”
6. Within 3 days the drum of hazardous waste must be placed into the first floor hazardous waste storage room

**When the drum is moved to the hazardous waste storage room**

1. As you move the drum of hazardous waste storage room please make sure that the waste drum is not leaking
2. As you are placing the drum in the room, make sure that the hazardous waste label is facing toward the aisle way. The floor is painted so the aisles can be easily identified.

## **APPENDIX 5**

### ***User Provided Environmental Documents***



BEECH STREET

BUILDING 1

BUILDING 3

BLDG.  
2

BUILDING 5

BUILDING 4

BUILDING 6A

BUILDING 6

BUILDING 7



**PROACTIVE  
CONSULTING  
SERVICES**



October 19, 1994

Mr. Mike Massey  
US Playing Card  
4590 Beech St.  
Cincinnati, OH 45212

Dear Mike:

This letter transmits our report of sampling conducted at your facility in Norwood Ohio on October 10, 1994.

The sampling included VOC and PCB soil samples collected from 4 areas on the plant grounds. The areas include the solvent cleaning booth, the transformer pad and surrounding soils, the drum storage pad and the location of the 3 UST's removed in 1988.

If you have any questions regarding this report, please call me at 821-0505.

Sincerely,

John J. Stirnkorb  
Proactive Consulting Services

enclosure

8075 Reading Road • Suite 301 • Cincinnati, Ohio 45237  
(513) 821-0505

Fax: (513) 821-0888

# US PLAYING CARD SOIL SAMPLING REPORT

## EXECUTIVE SUMMARY

Proactive Consulting Services was contracted to perform soil sampling and analysis of four areas of potential soil contamination. The areas included the solvent cleaning booth, the transformer pad and surrounding soils, the drum storage pad and the location of the 3 UST's removed in 1988.

Soil samples were cored using shelby tubes driven by a GeoProbe except the transformer pad area samples which were grab samples. The collected samples were analyzed for VOC except the transformer pad samples which were analyzed for PCB. These constituents were chosen based on the potential contaminants in each area.

Analysis performed detected no VOC at either the former UST site and the former drum storage area. The solvent shed area sample was contaminated with Tetrachlorethylene (TCE). The transformer pad samples contained PCB Arochlor 1260 in concentrations ranging from 590 mg/kg to 103,000 mg/kg.

## SAMPLING PROCEDURE

Sampling was performed using a GeoProbe drill rig with shelby tube recovery of soil cores for the former UST locations, the former Hazardous Waste storage location and the solvent shed location. The transformer pad area was sampled with a trowel to collect a grab sample from the surface. Sampling equipment was decontaminated by washing with soap and water followed by a fresh water rinse. The soil samples for PCB were collected using new precleaned sampling trowels.

### Former UST Location

Three sample locations were provided by the US Playing Card (USPC) representative (see Figure 1 for sample locations). Samples locations were designated T-1, T-2 and T-3. The sample locations were within the tank pit as could be seen by a slight settlement of the material used for backfill.

Location T-1 was started and advanced to a depth of 12 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 10' of brown

## US PLAYING CARD SOIL SAMPLING REPORT

mottled clay followed by 6" of clay and dry limestone. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Location T-2 was started and advanced to a depth of 16 inches below grade. At this point refusal was encountered. The sampler encountered a large rock or concrete. No reading was indicated on the HNU meter and the location was abandoned. A new location was offset approximately 16" from location T-2 and designated T-2B. Refusal was encountered at approximately 16-18" in depth. The Sampler was then moved to location T-3 and refusal was encountered at 12-16". Two new locations were selected, location T-4 and T-5.

Location T-4 was started and advanced to a depth of 10 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 8' of brown mottled clay. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Location T-5 was started and advanced to a depth of 6 feet below grade. The soil profile indicated approximately 20" of loose fill followed by approximately 4' of brown mottled clay. The core samples were checked with an HNU photoionization detector for any sign of volatile organics. None was detected. A sample from the 2-4' core was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis.

Table 1 shows the soil profile and HNU readings for each segment collected. The borings were not grouted at the direction of the USPC representative.

# US PLAYING CARD SOIL SAMPLING REPORT

TABLE 1  
SOIL PROFILE

Segment	Soil Type	HNU reading
T-1 0-2 feet	Fill	0
T-1 2-4 feet	Clay/Fill	0
T-1 4-6 feet	Clay	0
T-1 6-8 feet	Clay	0
T-1 8-10 feet	Clay	0
T-1 10-12 feet	Clay	0
T-4 0-2 feet	Fill	0
T-4 2-4 feet	Clay/Fill	0
T-4 4-6 feet	Clay	0
T-4 6-8 feet	Clay	0
T-5 0-2 feet	Fill	0
T-5 2-4 feet	Clay/Fill	0
T-5 4-6 feet	Clay	0

## Solvent Shed

Two sample locations were provided by the representative from USPC (see Figure 1 for sample locations). The sample locations were designated S-1 and S-2. These locations were in areas visibly contaminated.

Location S-1 was started and advanced to a depth of 4 feet below grade. The soil profile indicated approximately 26" of black visibly contaminated soil followed by approximately 1' of brown mottled clay. A fairly clear interface was seen for the darker soils and brown clay. No sample was collected for chemical analysis.

Location S-2 was started and advanced to a depth of 4 feet below grade. The soil profile indicated approximately 16" of black visually contaminated soil followed by approximately 2.5' of brown mottled clay. A fairly clear interface was seen for the darker soils and brown clay. A sample from the interface of the dark soil and the clay was collected and placed in a precleaned jar, labeled and placed on ice for VOC analysis. All borings were filled with dehydrated bentonite clay pellets and rehydrated with water to seal the hole.

## US PLAYING CARD SOIL SAMPLING REPORT

### Former Hazardous Waste Storage Area

Five sample locations were selected for sampling. The area was divided into four equal quadrants and a sample was taken from near the center of each quadrant. An additional sample was collected at the center of the full area (see Figure 1 for sample locations). Samples locations were designated H-1, H-2, H-3, H-4 and H-5.

The storage area was approximately 30' by 60' and was located on a former coal storage area. Approximately 6" of coal was present across the surface of the soil in this area. Core samples were collected using shelby tubes. Borings were advanced to 2 feet. The samples for analysis were collected from the coal soil interface including a portion of the coal and the top 2" of soil. During sampling no obvious visible signs of contamination were seen.

The samples were collected in glass jars and placed on ice pending analysis.

### Transformer Pad Area

Three samples were collected from the transformer pad area. Two samples were collected from surface soils and one sample was collected from a hardened tar like material on top of the concrete pad. The soil samples were numbered P-1 and P-2. The debris sample was numbered P-3.

Samples P-1 and P-2 were collected from the top 4" of soil directly adjacent to the concrete transformer pad. The samples were collected with precleaned sampling trowels placed in a glass jar, labeled and placed on ice. The tar like debris was scraped from the surface of the transformer pad directly in front of the south most transformer using the sampling trowel from sample number P-2. The sampling trowel was decontaminated with a soap and water solution and rinsed with fresh water two times prior to collection of the sample. The debris sample (P-3) appeared to be a combination of an asphalt based material and sand which was accumulated on the concrete pad near the grounding strap.

All samples were placed in a cooler with ice and transported under chain of custody to EEI laboratories. See appendix A for chain of custody documents.

# US PLAYING CARD SOIL SAMPLING REPORT

## SAMPLE ANALYSIS

The samples for the UST area, solvent shed and hazardous waste storage area were analyzed for Volatile Organic Compounds (VOC) using EPA method 8260. The transformer pad samples were analyzed for Polychlorinated Biphenyls (PCB's) using EPA method 8080. See appendix A for laboratory report.

## ANALYTICAL RESULTS

The former UST area and former hazardous waste storage area samples analyzed and found to contain no detectable levels of VOC using EPA method 8260.

The solvent shed sample S-2 contained 34.9 mg/kg Tetrachlorethylene (TCE).

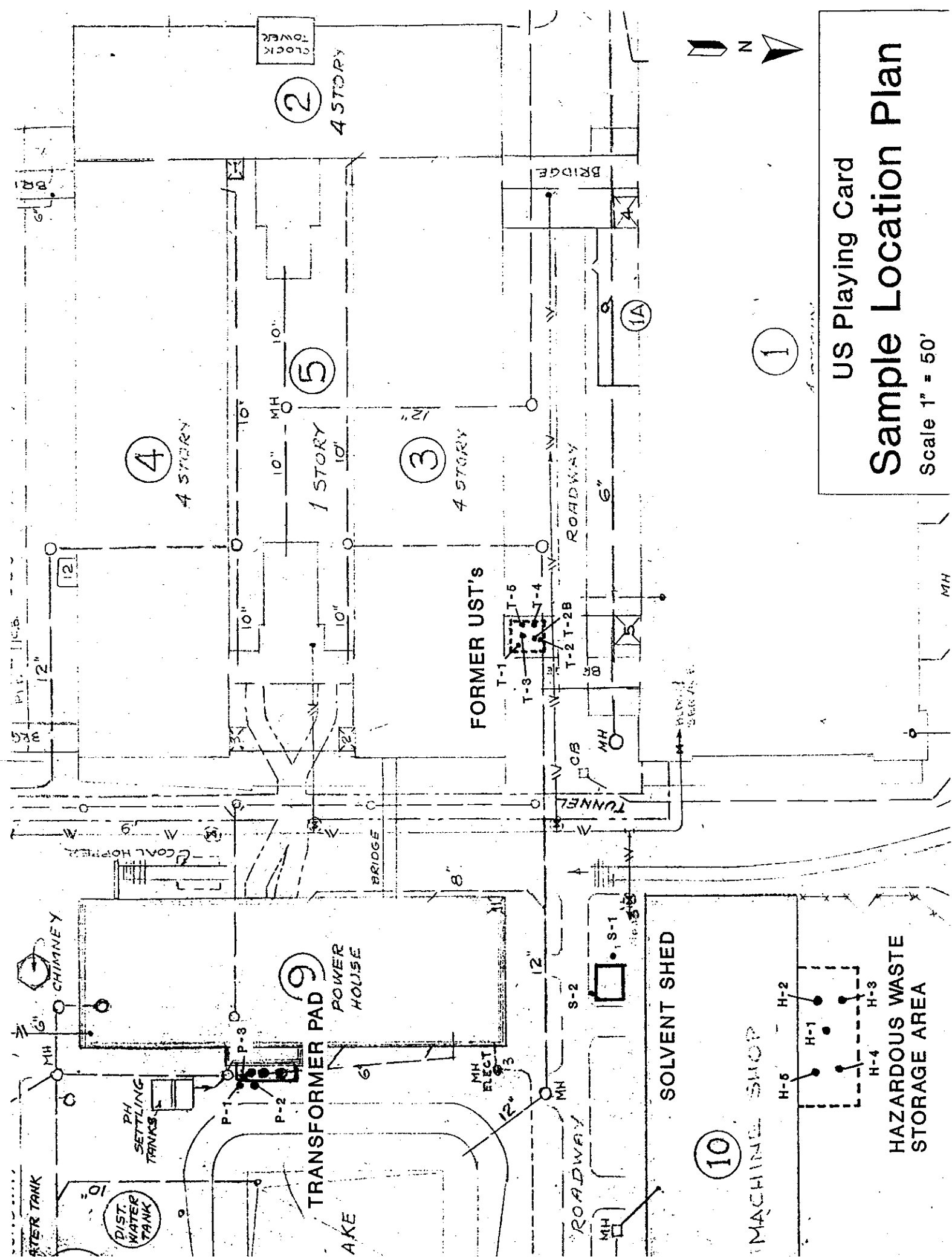
The transformer pad area samples P-1, P-2 and P-3 contained PCB Arochlor 1260 at 2090, 590 and 103,000 mg/kg respectively. See table T-2 for results.

TABLE T-2  
SAMPLE RESULTS

Sample Number	Compound	Concentration
=====		
T-1	VOC	BDL T-4 VOC BDL
T-5	VOC	BDL
S-2	VOC (Tetrachlorethylene)	34.9 mg/kg
H-1	VOC	BDL
H-2	VOC	BDL
H-3	VOC	BDL
H-4	VOC	BDL
H-5	VOC	BDL
P-1	PCB (Arochlor 1260)	2,090 mg/kg
P-2	PCB (Arochlor 1260)	590 mg/kg
P-3	PCB (Arochlor 1260)	103,000 mg/kg

VOC = Volatile Organic Compound  
PCB = Polychlorinated Biphenyl  
BDL = Below Detection Limit  
mg/kg = milligram per kilogram

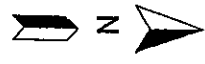
# ***APPENDIX A***



US Playing Card

# Sample Location Plan

Scale 1" = 50'



1

10



Received: 10/06/94

10/17/94 15:19:36

REPORT PRO-ACTIVE CONSULTING SERV.  
TO 8075 READING RD. STE. 301  
READING, OHIO 45237

PREPARED Environmental Enterprises  
BY 10163 Cincinnati-Dayton Rd.  
Cincinnati, Ohio 45241

CERTIFIED BY ATTEN JOHN STIRNKORBATTEN Wayne CollierPHONE (513) 772-2818CONTACT SUZYCLIENT PROA01 SAMPLES 12COMPANY PRO-ACTIVE CONSULTING SERV.FACILITY READING, OHIO

Enclosed are the results of specified samples submitted for  
analysis. If you have any questions please use Order # for  
faster identification.

OHIO EPA CERTIFICATION: CHEMICAL 4095WORK ID U.S. PLAYING CARDTAKEN CUSTOMERTRANS DELIVEREDTYPE SOLIDS

P.O. # \_\_\_\_\_

INVOICE under separate cover

## SAMPLE IDENTIFICATION

## TEST CODES and NAMES used on this workorder

01 T-1  
02 T-4  
03 T-5  
04 S-2  
05 H-1  
06 H-2  
07 H-3  
08 H-4  
09 H-5  
10 P-1  
11 P-2  
12 P-3

PCBS PCB, solid  
SVOA Volatile Organics, solid

Received: 10/06/94

## Results By Test

TEST CODE	Sample <u>10</u>	Sample <u>11</u>	Sample <u>12</u>
default units	(entered units)	(entered units)	(entered units)
PCBS	2,090	590	103,000
mg/kg	mg/kg 1260	mg/kg 1260	mg/kg 1260

Received: 10/06/94

Results by Sample

SAMPLE ID T-1 FRACTION 01A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 08:56:00 Category

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachloroethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>95</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>98</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>100</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

Results by Sample

SAMPLE ID T-4 FRACTION 02A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 10:45:00 Category

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>91</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>102</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>101</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

## Results by Sample

SAMPLE ID T-5 FRACTION 03A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 10:57:00 Category

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>96</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>100</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>97</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

## Results by Sample

SAMPLE ID S-2 FRACTION 04A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 11:30:00 Category

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>30</u>
Bromodichloromethane	<u>BDL</u>	<u>30</u>
Bromoform	<u>BDL</u>	<u>30</u>
Bromomethane	<u>BDL</u>	<u>60</u>
Carbon tetrachloride	<u>BDL</u>	<u>30</u>
Chlorobenzene	<u>BDL</u>	<u>30</u>
Chloroethane	<u>BDL</u>	<u>30</u>
Chloroform	<u>BDL</u>	<u>30</u>
Chloromethane	<u>BDL</u>	<u>60</u>
Dibromochloromethane	<u>BDL</u>	<u>30</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>30</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>30</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>30</u>
1,1-Dichloroethane	<u>BDL</u>	<u>30</u>
1,2-Dichloroethane	<u>BDL</u>	<u>30</u>
1,1-Dichloroethene	<u>BDL</u>	<u>30</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>30</u>
1,2-Dichloropropane	<u>BDL</u>	<u>30</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>30</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>30</u>
Ethyl benzene	<u>BDL</u>	<u>30</u>
Methylene chloride	<u>BDL</u>	<u>60</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>30</u>
Tetrachlorethene	<u>34.9</u>	<u>30</u>
Toluene	<u>BDL</u>	<u>30</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>30</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>30</u>
Trichloroethene	<u>BDL</u>	<u>30</u>
Trichlorofluoromethane	<u>BDL</u>	<u>30</u>
Vinyl chloride	<u>BDL</u>	<u>30</u>
Xylenes	<u>BDL</u>	<u>90</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>94</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>102</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>107</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 6,000UNITS mg/kgMETHOD 8260

Received: 10/06/94

## Results by Sample

SAMPLE ID H-1 FRACTION 05A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 12:33:00 Category \_\_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>96</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>99</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>94</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

## Results by Sample

SAMPLE ID H-2 FRACTION 06A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 12:35:00 Category \_\_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>108</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>102</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>111</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260



Received: 10/06/94

## Results by Sample

SAMPLE ID H-3 FRACTION 07A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 12:42:00 Category \_\_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>98</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>103</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>93</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

Results by Sample

SAMPLE ID H-4 FRACTION 08A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 12:49:00 Category \_\_\_\_\_

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>97</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>102</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>97</u>	<u>74</u> - <u>121</u>

Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

Received: 10/06/94

## Results by Sample

SAMPLE ID H-5 FRACTION 09A TEST CODE SVOA NAME Volatile Organics, solid  
 Date & Time Collected 10/06/94 12:59:00 Category

PARAMETER	RESULT	LIMIT
Benzene	<u>BDL</u>	<u>0.0050</u>
Bromodichloromethane	<u>BDL</u>	<u>0.0050</u>
Bromoform	<u>BDL</u>	<u>0.0050</u>
Bromomethane	<u>BDL</u>	<u>0.010</u>
Carbon tetrachloride	<u>BDL</u>	<u>0.0050</u>
Chlorobenzene	<u>BDL</u>	<u>0.0050</u>
Chloroethane	<u>BDL</u>	<u>0.0050</u>
Chloroform	<u>BDL</u>	<u>0.0050</u>
Chloromethane	<u>BDL</u>	<u>0.010</u>
Dibromochloromethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,3-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,4-Dichlorobenzene	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
trans-1,2-Dichloroethene	<u>BDL</u>	<u>0.0050</u>
1,2-Dichloropropane	<u>BDL</u>	<u>0.0050</u>
cis-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
trans-1,3-Dichloropropene	<u>BDL</u>	<u>0.0050</u>
Ethyl benzene	<u>BDL</u>	<u>0.0050</u>
Methylene chloride	<u>BDL</u>	<u>0.010</u>
1,1,2,2-Tetrachloroethane	<u>BDL</u>	<u>0.0050</u>
Tetrachlorethene	<u>BDL</u>	<u>0.0050</u>
Toluene	<u>BDL</u>	<u>0.0050</u>
1,1,1-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
1,1,2-Trichloroethane	<u>BDL</u>	<u>0.0050</u>
Trichloroethene	<u>BDL</u>	<u>0.0050</u>
Trichlorofluoromethane	<u>BDL</u>	<u>0.0050</u>
Vinyl chloride	<u>BDL</u>	<u>0.0050</u>
Xylenes	<u>BDL</u>	<u>0.015</u>

SURROGATE	%RECOVERY	LIMITS
Dibromofluoromethane	<u>98</u>	<u>80</u> - <u>120</u>
Toluene-d8	<u>102</u>	<u>81</u> - <u>117</u>
4-Bromofluorobenzene	<u>98</u>	<u>74</u> - <u>121</u>

## Notes and Definitions for this Report:

DATE RUN 10/12/94ANALYST REHCONC FACTOR 1UNITS mg/kgMETHOD 8260

### USPC Asbestos Summary

Area ACM Located	Material Containing ACM	Rating	Occupied Space	Estimated Cost of Abatement	Adjusted Cost	
Building #1	Aircell-Pipe Insulation throughout the building		Yes	\$26,325	\$325.00	287 Linear Feet Dams
Building #1	Cementitious Fittings on fiberglass lines throughout the building		Yes	\$1,742		6000 Square Feet
Building #1	Layered-paper pipe insulation throughout the building		Yes	Included in Aircell above		
Building #1	Preformed-block pipe insulation throughout the building		Yes	Included in Aircell above		
Building #1	Window caulking throughout the building		Yes	\$15,000		
Building #1	Roofing		No	\$125,500		
			Total	\$172,767		
Building #2	Layered-paper pipe insulation throughout the building		Yes	Included in Aircell below		
Building #2	Aircell-Pipe Insulation throughout the building		Yes	\$16,315	\$1,950	180 Linear Feet Dams
Building #2	Window caulking throughout the building		Yes	\$65,424		
Building #2	Floor tile under carpet throughout the building		Yes	\$84,654		
Building #2	Radiator heat shield throughout the building		Yes	\$510		
Building #2	Roofing		No	\$32,400		
			Total	\$199,313		
Building #3	12in. X 12in. Floor tile throughout building		Yes	\$2,150		
Building #3	Preformed-block pipe insulation throughout the building		Yes	\$19,008	\$520	400 Linear Feet Dams
Building #3	Layered-paper pipe insulation throughout the building		Yes	Included in preformed block above		
Building #3	Window caulking throughout the building		Yes	\$15,575		
Building #3	Roofing		No	\$45,600		
			Total	\$80,332		
Building #4	Preformed-block pipe insulation throughout the building		Yes	Included in Aircell below		
Building #4	Aircell-Pipe Insulation throughout the building		Yes	\$31,655	\$130	10 Linear Feet Dams
Building #4	9in. X 9in. And 12in. X 12in. Floor tile throughout the building		Yes	\$2,005	\$500	250 Square Feet Dams
Building #4	Window caulking throughout the building		Yes	\$15,144		
Building #4	Roofing		No	\$45,600		
			Total	\$100,405		
Building #5	Aircell-Pipe Insulation throughout the building		Yes	\$2,925		
Building #5	Layered-paper pipe insulation throughout the building		Yes	Included in Aircell above		
Building #5	Roofing		No	\$45,600		
			Total	\$51,525		
Building #6	Preformed-block pipe insulation throughout the building		Yes	\$9,515		
Building #6	Window Caulking		Yes	\$1,245		
Building #6	Resilient Floor Covering		Yes	\$31,200		
Building #6	Roofing		No	\$0.00		
			Total	\$42,260		
Building #6A	9in. X 9in. Floor tile throughout the building		Yes	\$13,570		
Building #6A	Linoleum throughout the building		Yes	Included above		
Building #6A	Preformed-block pipe insulation throughout the building		Yes	Included in Aircell below		
Building #6A	Tarred tape pipe wrap insulation throughout the building		Yes	\$250		
Building #6A	Preformed-block pipe insulation throughout the building		Yes	Included in Aircell below		
Building #6A	Aircell-Pipe Insulation throughout the building		Yes	\$17,355	\$1,430	110 Linear feet dams
Building #6A	Lining of radiator covers throughout the building		Yes	\$500		
Building #6A	Roofing		No	\$21,600		
			Total	\$53,685		
Building #7	9in. X 9in. And 12in. X 12in. Floor tile throughout the building		No ( warehouse )	\$24,125	\$6,670	2000 Linear Feet Dams
Building #7	Linoleum throughout the building		No ( warehouse )	Included Above		
Building #7	Preformed-block pipe insulation throughout the building		No ( warehouse )	Included in Aircell below		
Building #7	Aircell-Pipe Insulation throughout the building		No ( warehouse )	\$55,250	\$1,455	100 Linear Feet Dams
Building #7	Window caulking throughout the building		No ( warehouse )	\$15,950		
Building #7	Layered-paper pipe insulation throughout the building		No ( warehouse )	Included in Aircell above		
Building #7	Tarred tape pipe wrap insulation throughout the building		No ( warehouse )	\$455		

# USPC Asbestos Summary

Area ACH Located	Material Containing ACH	Rating	Occupied Space	Estimated Cost of Abatement	Adjusted Cost	Comments
Building #7	Asbestos duct insulation throughout the building		No (uninhabited)	Included in Air CM Above		
Building #7	Roofing		No (uninhabited)	\$11,690		
			TOTAL	\$192,423		
Building #8	Asbestos-Pipe Insulation throughout the building		No - Abandoned Building	\$8,100		
Building #8	Window caulking throughout the building		No - Abandoned Building	\$4,800		
Building #8	Roofing		No - Abandoned Building	\$40,800		
			TOTAL	\$54,400		
Building #9	Preformed block tank insulation		No - Power House	\$140,000		
Building #9	Preformed-block pipe insulation throughout the building		No - Power House	\$28,702		
Building #9	Layered-roofer pipe insulation throughout the building		No - Power House	Included in Preformed Block Pipe Above		
Building #9	Transite panel behind electrical breakers		No - Power House	\$400		
Building #9	Caulking on boilers		No - Power House	\$12,800		
Building #9	Preformed bricks on boilers		No - Power House	\$12,000		
Building #9	Preformed-block insulation on boiler breasting inside and outside of building		No - Power House	\$40,800		
Building #9	Boiler door gasket		No - Power House	\$4,454		
Building #9	Window caulking throughout the building		No - Power House	\$28,000		
Building #9	Roofing		No - Power House	\$278,288		
			TOTAL	\$778,288		
Building #10	Asbestos-Pipe Insulation throughout the building		Yes	\$876		
Building #10	Window caulking throughout the building		Yes	\$4,438		
Building #10	Roofing		No	\$37,600		
			TOTAL	\$42,863		
Building #13	Window caulking throughout the building		No	\$578		
Building #13	Roofing		No	\$1,128		
			TOTAL	\$1,701		
Building #16	Asbestos-Pipe Insulation throughout the building		No	\$811		
Building #16	Roofing		No	0		
			TOTAL	\$811		
Building #18	Window glazing throughout the building		No	\$646		
Building #18	Asbestos-Pipe Insulation throughout the building		No	\$720		
Building #18	Roofing		No	\$18,000		
			TOTAL	\$19,326		
Tunnels	Thermal Insulation		No	\$48,888		
Overhead Walkway	Layered pipe insulation		Yes	\$1,690		
			Yes	\$1,690		
Training	Class Three Asbestos Work (Maintenance Employees)		-	\$3,000	\$3,000	Revised from all 45 hours to 40 hours (Confined Space)
TOTAL				\$1,348,336	\$17,710.00	

PREPARED BY: *[Signature]*  
 DATE: 11/16/2011  
 BY: *[Signature]*

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**All Buildings**

The condition of window caulking around the windows of most buildings ranged from good to significantly damaged condition. BHE recommends that a licensed asbestos abatement contractor or asbestos trained renovation contractor repair the damaged caulking on windows with significant damage.

**Tunnels**

The inspector noted aircell pipe insulation debris in the tunnels from Building 1 to Building 9 and from Buildings 7 to Building 9. BHE recommends that a licensed abatement contractor clean up the debris and repair the damaged pipe insulation in the tunnels.

**Overhead Walkway**

The inspector noted 65 linear feet of significantly damaged layered-paper pipe insulation on the overhead walkway between Buildings 3 and 9.

**Building 1**

Approximately 25 linear feet of damaged pipe insulation was noted by the inspector in Room 2 behind the cooker machine. This insulation is in an area occupied by employees that operate the cooker machine. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

**Building 2**

The inspector noted approximately 150 linear feet of damaged layered-pipe insulation in Building 2, Room 41 on the first floor and 30 linear feet in Room 8 on the fourth floor. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

**Building 3**

The inspector noted damaged layered-paper-pipe insulation in the following locations:  
Approximately 20 linear feet of damaged layered pipe insulation in Room 46 on the first floor  
Approximately 10 linear feet in Rooms 56/57 on the third floor  
Approximately 5 linear feet in Room 52 on the fourth floor

NOT ASBESTOS

BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

#### Building 4

The inspector noted approximately 250 square feet of damaged floor tile in Room 11 on the first floor. BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. The inspector noted approximately 10 linear feet of damaged preformed-block pipe insulation in Room 7 on the second floor. BHE recommends that a licensed asbestos abatement contractor repair the damaged piping.

#### Building 6A

The inspector noted damaged layered-paper pipe insulation in the following locations:

- Approximately 20 linear feet of in Room 48 on the first floor
- Approximately 10 linear feet in Room 46 of the first floor

The inspector noted significantly damaged layered-paper pipe insulation in the following location:

- Approximately 30 linear feet of layered pipe insulation in Room 4 on the third floor

The inspector noted significant damage on aircell pipe insulation in the following locations:

- Approximately 20 linear feet of aircell-pipe insulation in Room 46 of the first floor
- Approximately 30 linear feet of aircell-pipe insulation in Room 4 on the third floor

BHE recommends that a licensed asbestos abatement contractor repair or remove the damaged pipe insulation.

#### Building 7

The inspector noted significantly damaged floor tile in the following locations:

- Approximately 1,125 square feet Room 1 in the basement
- Approximately 70 square feet in Room 41 on the first floor
- Approximately 150 square feet of damaged tile in Room 76 on the first floor
- Approximately 40 linear feet in Room 26 on the second floor
- Approximately 2000 square feet of floor tile in Room 20 on the third floor.

noted that the floor tile was being run over daily by hand trucks.

BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. The inspector noted damaged preformed-block pipe insulation in the following locations:



- Approximately 15 linear feet of damaged was found in Room 12
- Approximately 80 linear feet in Room 15 of the first floor
- Approximately 10 linear feet in Room 22 of the third floor

The inspector noted damaged layered paper pipe insulation in the following locations:

- Approximately 10 linear feet of damaged layered-pipe insulation in Room 26 on the second floor

BHE recommends that a licensed asbestos contractor repair or remove the damaged insulation.

#### Building 8 X

The inspector noted damaged air-cell-pipe insulation in Building 8 (abandoned and unoccupied building). Pipe insulation was seen on the dirt floor of the crawl space on the west end of the building. The damaged insulation was wet apparently from water that has leaked through the damaged roof. BHE understands that USPPCC is considering demolishing this building. State regulations require that all regulated ACM be removed prior to the building being demolished.

BHE recommends that a licensed asbestos abatement contractor remove RACM prior to building demolition.

#### Building 9 X

The inspector noted Building 9 (Powerhouse) with having the most damaged ACM material. Tanks with preformed-block insulation and insulated piping in the building are significantly damaged. Tank insulation was exposed without jacketing and insulation debris from some tanks was lying on the floor. Pipe insulation was also exposed in some areas with insulation lying on the floor. Preformed-block insulation debris from boilers was also found in Building 9.

Photographs depicting some of the damaged ACMs in Building 9 were taken and presented in Appendix C. The inspectors recommend this building receive top priority for corrective action. BHE recommends that a licensed asbestos abatement contractor cleanup, remove, or repair the damaged ACM in Building 9. All significantly damaged ACM should be removed (ie, non-repairable).

Damaged and significantly damaged aircell-pipe insulation was identified in Buildings 15 and 18. The inspector noted that most insulation from the piping was on the ground. BHE recommends that a licensed asbestos abatement contractor cleanup the pipe insulation debris.

#### Asphalt-based Roofing Material, Floor Tile, and Mastic

Asphalt-based roofing materials and resilient floor coverings, such as floor tile and linoleum, are considered nonfriable when in good condition and not damaged. Currently, asbestos-containing asphalt-based roofing and resilient floor coverings such as floor tile, in good condition, are not considered regulated asbestos-containing material (RACM) per revised EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations of November 20, 1990. This is because the asbestos fibers are tightly bound in an asphalt or vinyl matrix and are not readily released into the air. Nonfriable asbestos-containing roofing and floor tile are classified as "Category I nonfriable ACM."

The State of Ohio does not require that these materials be removed from buildings prior to demolition. However, any renovation activities that would subject the ACM to abrasive forces (such as sanding, cutting, or grinding) could render the ACM friable and, therefore, result in the floor tile and or roofing becoming RACM subject to the NESHAP regulations.

When planning renovation activities, asbestos-containing roofing materials, linoleum, and floor tile and mastic should be considered carefully to ensure that they are not disturbed. If these materials will be affected by subsequent renovation, they should be removed properly by specially trained and equipped workers (usually a licensed asbestos abatement contractor) before construction or interior demolition work begins. Although a licensed asbestos abatement contractor is not required for the removal of Category I nonfriable materials (provided they are non-friable and in good condition), contractors working with these materials must comply with the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) which has specific training requirements and work practices for construction or maintenance work involving the removal of Category I nonfriable materials.

The estimated asbestos removal costs presented in Table 3 are based on the estimated quantities of ACM and an average of current unit-price quotations from local asbestos abatement

contractors. The estimate is provided as an indication of typical costs for asbestos abatement and is intended for use as a planning tool. Actual bid prices from contractor for asbestos removal can be extremely variable.

Qualified independent third party industrial hygienists and project monitors are recommended to oversee contractor performance and to ensure that the asbestos is removed in a safe and compliant manner and disposed properly in accordance with the project specifications and applicable federal, state, and local asbestos regulations. A rough "ball park" estimate for third party oversight and air monitoring is also presented; however, actual costs for third party oversight will depend on the project schedule and scope, length and number of work shifts, and the duration of the abatement project.

#### Employee Training Including Operations and Maintenance Work

Currently, the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) defines four classes of work involving ACM and has specific training requirements for each class.

Removal of asbestos-containing thermal system insulation or surfacing materials is considered "Class I asbestos work." OSHA requires that employees performing Class I operations receive the four-day EPA AHERA asbestos abatement worker training. Class I asbestos work should be conducted by a licensed asbestos abatement contractor.

Removal of asbestos-containing wallboard, resilient floor coverings, roofing and siding shingles, and construction mastics is considered "Class II asbestos work." OSHA requires that employees performing Class II operations also receive the four-day EPA AHERA asbestos abatement worker training.

Repair and maintenance operations, where thermal system insulation and surfacing material is likely to be disturbed, are considered "Class III asbestos work." OSHA requires that employees performing Class III operations receive the EPA 16-hour Operations and Maintenance (O&M) training course, including hands-on training on respirators and work practices.

Maintenance and custodial activities during which employees contact ACM (but do not disturb it) and activities to clean up waste and debris containing ACM are considered "Class IV asbestos work." OSHA requires that employees performing Class IV operations receive the EPA two-

hour awareness training. This course should include instruction on the locations of ACM and on the recognition of damage, deterioration, or delamination of ACM. Class IV work must be overseen by a competent person who has received at least the two-day O&M training course. BHE recommends that any workers performing Class II, III, or IV operations receive the appropriate training to reduce the risk of worker or occupant exposure to asbestos fibers during routine or emergency maintenance operations.



December 6, 2002

Mr. Mark Blaha  
Safety Director  
U.S. Playing Card Company  
4590 Beech Street  
Cincinnati, Ohio 45212-3497

**Re: Pre-demolition Asbestos Sampling of the Jet Dry Machine  
PN 1407.002**

Dear Mr. Blaha:

On October 23, 2002, pursuant to your request, BHE Environmental, Inc. (BHE) conducted a pre-demolition asbestos survey of the jet dry machine located at the U.S. Playing Card Company in Cincinnati, Ohio.

Mr. David Gregory, an Ohio-certified Asbestos Hazard Evaluation Specialist (ODOH Cert. No. 32465), conducted the inspection. Mr. Rob Wilmot prepared this report. Mr. Mark Karaffa, CIH, Director of BHE's Industrial Hygiene and Safety Group, served as project manager and senior reviewer.

#### **SAMPLING AND ANALYTICAL METHODS**

BHE collected seven samples of suspect asbestos-containing material from the jet dry machine that included:

- Gasket material on the access doors (upper and lower level)
- Preformed-block duct insulation (upper level)

Samples were submitted to Analytica Solutions, Inc. in Thornton, Colorado (Analytica) for analysis by polarized-light microscopy (PLM) in accordance with the prescribed Environmental Protection Agency (EPA) analytical protocol (40 CFR Part 763, Appendix A to Subpart F). Analytica is an AIHA- and NIST-accredited asbestos laboratory.

This analytical method, which the EPA currently accepts for the determination of asbestos in bulk samples of suspect asbestos-containing material (ACM), is used for the qualitative identification of six morphologically-different types of asbestos fibers: chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite asbestos. The method specifies that the asbestos content in a bulk sample shall be determined by visual estimation and reported as a finite percentage (rounded to the nearest percent) within the range of 0 to 100. Minute quantities of asbestos in bulk samples may be reported as "trace" (tr) or less than 1 percent. The analytical method determined the "area percent" asbestos or the percentage of the area of a microscopic field of view that is occupied by asbestos fibers.

The EPA and the Occupational Safety and Health Administration (OSHA) define ACM as any material that contains more than 1 percent asbestos.

## RESULTS AND DISCUSSION

The gasket material sampled on the access doors on the lower level was negative for asbestos content, i.e., no asbestos fibers were detected.

Asbestos greater than 1 percent was found in samples of the following materials:

- Preformed-block duct insulation (upper level, approximately 560 square feet total)
- Rope gasket material on the access doors (upper level only, approximately 304 linear feet total)

Asbestos regulations require the removal of friable ACMs (including preformed block duct insulation and rope gaskets) prior to demolition of the jet dryer. BHE recommends that a licensed asbestos abatement contractor remove the doors with the gasket material intact prior to demolition. A licensed asbestos abatement contractor must submit 10-day notification to the Ohio EPA and Department of Health prior to removal of the ACM identified.

Please do not hesitate to call me at 513-326-1500 if you have any questions or comments, or would like additional technical assistance, abatement oversight, or air monitoring during removal of the ACM from the jet dryer.

Sincerely,

  
BHE ENVIRONMENTAL, INC.

Rob Willmot  
Industrial Hygienist

CRW/mcb



Analytica Group Company

October 28, 2002

Mark Karaffa  
BHE Environmental, Inc.  
11733 Chesterdale Road  
Cincinnati, OH 45246-3405

Re: LGN 343595 Project: 1407.002, US Playing Card-Jet Dry Machine

Dear Mark Karaffa:

The bulk samples recently submitted to our laboratory have been analyzed by polarized light microscopy (PLM), the EPA-recommended method for identification of fibrous constituents in building materials. The results of these analyses are summarized in the enclosed table. Also enclosed is a copy of documentation submitted with your samples.

If you have any technical questions concerning these analyses, please feel free to call me. All other calls should be directed to our Customer Service Representatives.

Sincerely,  
Jeff Lyons  
President  
Enclosures

NVLA®  
NMLAP LAB CODE 101086-0

"The Science of Analysis, The Art of Service"



Analytica Solutions, Inc.  
12189 Pennsylvania Street  
Thornton, Colorado 80241  
(303) 469-8868  
(800) 873-8707  
Fax: (303) 469-5254



*[Signature]*  
 Douglas Kent

Date: 10/28/2002

Analyst:

Asbestiform Minerals:	Amosite	Anthophyllite	Chrysotile	Crocidolite	Tremolite-Actinolite	TOTAL ASBESTOS	Other Fibrous Materials:	Fibrous Glass	Cellulose	Synthetics	Other:	Percent Nonfibrous Material
	5.0	25.0	30.0	15.0	5.0	50.0	15.0	5.0	5.0	58.0	53.0	
	2.0	20.0	22.0	15.0	5.0	58.0	15.0	5.0	5.0	58.0	53.0	
	2.0	25.0	27.0	15.0	5.0	58.0	15.0	5.0	5.0	58.0	53.0	

Sample Number: 102302-A-1 102302-A-2 102302-A-4 102302-A-5 102302-A-6

**Results of PLM Analysis:** Visual Area Estimation: Percentages Detected

Sample Number	Sample Date	Description
102302-A-1	10/23/2002	Gasket-lower level [grey woven fiberqlass]
102302-A-2	10/23/2002	Gasket-lower level [tan/grey woven fiberqlass]
102302-A-4	10/23/2002	PFB duct ins. [grey, fibrous]
102302-A-5	10/23/2002	PFB duct ins. [grey, fibrous]
102302-A-6	10/23/2002	PFB duct ins. [grey, fibrous]

**Sample Description:**

Project ID: 1407.002, US Playing Card-Jet Dry Machine

Client: BHE Environmental, Inc.

LGN: 343595

**RESULTS OF BULK ASBESTOS SAMPLE ANALYSIS BY POLARIZED LIGHT MICROSCOPY (PLM)**

Analytica Solutions, Inc.  
 12189 Pennsylvania Street  
 Thornton, Colorado 80241  
 (303) 469-8868  
 (800) 873-8707  
 Fax: (303) 469-5254







*[Signature]*  
 Analyst: Douglas Kane

Date: 10/28/2002

Asbestiform Minerals:					
Amosite					
Anthophyllite					
Chrysotile	85.0				
Crocidolite					
Tremolite-Actinolite					
TOTAL ASBESTOS	85.0				
Other Fibrous Materials:					
Fibrous Glass					
Cellulose	10.0				
Synthetic					
Other:					
Percent Nonfibrous Material	5.0				

Results of PIM Analysis: Visual Area Estimation: Percentages Detected

Sample Number	Sample Date	Description
102302-A-7	10/23/2002	Gasket-upper level [tan, fibrous]
102302-A-8	10/23/2002	Gasket-upper level [tan, fibrous]

Sample Description:

Project ID: 1407.002, US Playing Card-Jet Dry Machine

Client: BHE Environmental, Inc. LGN: 343595

RESULTS OF BULK ASBESTOS SAMPLE ANALYSIS BY  
 POLARIZED LIGHT MICROSCOPY (PLM)



Analytica Solutions, Inc.  
 12189 Pennsylvania Street  
 Thornton, Colorado 80241  
 (303) 469-8868  
 (800) 873-8707  
 Fax: (303) 469-5254

343595

## CHAIN-OF-CUSTODY RECORD

**BHE ENVIRONMENTAL, INC.**  
11735 Chesterdale Road  
Cincinnati, Ohio 45246  
(513) 328-1600  
FAX (513) 328-1550

Send Report To: MARK KANA CFA

Project Number: US Playing Card  
Project Manager: MAK

Site Name: US Playing CARD - SET DRY MACHINE  
Lab Destination: ANALYTICAL  
FAX (613) 328-1550

[illegible]

**Special Instructions:**

Relinquished By: DJG  
 Date Relinquished: 10/23/02  
 Received By: Errol W. Palmer  
 Date Received: 10/24/02 - 9:15 Am  
 Condition on Receipt: 1

## ANALYTICA SOLUTIONS

12189 Pennsylvania Street  
Thornton, Colorado 80241

### POLARIZED LIGHT MICROSCOPY (PLM) BULK SAMPLE ANALYSIS PROCEDURES

Bulk samples of construction materials are analyzed by a professional mineralogist with a minimum of a Bachelor's Degree in Geology using the July 1993, EPA Test Method, (EPA/600/R-93/116), "Method for the Determination of Asbestos in Bulk Building Materials". Samples are prepared and analyzed in different Cargille® certified refractive index oils. Estimates of asbestos content are based on visual comparisons using a calibrated graticule. Additional tests and treatments (see below) may also be required for certain samples.

Analytica is accredited by the National Institute of Standards and Technology (Lab Code #101086) under the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos analysis. Analytica participates in the NVLAP bulk asbestos proficiency testing program (results available upon request). An in-house QA/QC program is maintained on a daily basis that requires, at a minimum, 10% of samples submitted to be re-analyzed and logged into a quality control tracking system. Analytica participates in two round robin QA/QC programs annually with accredited laboratories throughout the United States. Unused portions of samples are archived for six months, then disposed of or returned to the client.

#### ASHING

Ashing is a procedure in which one half of the sample is placed in a crucible and then set in a furnace at 500° C for one hour or more. Most non-silicate interferences are eliminated, leaving only asbestos undisturbed. The amount of ashed material is compared to the original amount to determine the volume percent lost due to ashing. The sample is then analyzed by PLM for the type and amount of asbestos present. The results shown on the final report are the percentage of asbestos in the original material, not the ashed material, i.e. if 50% of the original material is lost due to ashing and the ashed sample contains 10% asbestos, then the final report would show 5% asbestos in the original material.

#### POINT COUNTING

As of November 20, 1990, the National Emission Standards for Hazardous Air Pollutants (NESHAP) established rules requiring that friable ACM bulk samples with less than 10% asbestos be analyzed by the point count procedures described in the EPA-600/R-93/116 test method. Analytica does have experienced analysts to perform point counts if needed. Analytica Solutions, Inc. cannot determine bulk sample friability and cannot assume responsibility for client compliance with the NESHAP rule.

- (1) In January 1994, a NESHAP clarification was issued regarding analysis of multi-layered samples. This clarification requires all layers of a sample must be analyzed and reported separately. On August 1, 1994, EPA issued a notice of advisory adopting a new AHERA policy consistent with the NESHAP policy. When reviewing an Analytica Solutions PLM analysis report, do not use the composite result for the determination of positive (> 1%) ACM. Determination of ACM should be made strictly from the individual layers of each sample. On August 10, 1994, OSHA ruled that to demonstrate that Potential Asbestos Containing Material (PACM) does not contain asbestos, tests shall include analysis of 3 bulk samples of each homogeneous area of the PACM collected in a randomly distributed manner.
- (2) This test report relates only to items tested.
- (3) NVLAP policy requires that this report may not be reproduced except in full, without the written approval of the laboratory.
- (4) NVLAP policy requires that this report must not be used by the client to claim product endorsement by NVLAP or any agency of the United States Government.

**PN 1407.001**

**September 2002**

**SURVEY FOR  
ASBESTOS-CONTAINING MATERIALS**

**Prepared for:  
The United States Playing Card Company  
4590 Beech Street  
Cincinnati, Ohio 45212-3497**

**Prepared by:  
BHE Environmental, Inc.  
11733 Chesterdale Road  
Cincinnati, Ohio 45246-3405  
Phone: 513-326-1500  
Fax: 513-326-1550  
[www.bheenv.com](http://www.bheenv.com)**

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## **TABLE OF CONTENTS**

EXECUTIVE SUMMARY.....	1
1.0 INTRODUCTION.....	4
1.1 BUILDING INSPECTION.....	4
1.2 ASBESTOS INSPECTION.....	5
1.3 ANALYTICAL METHODS.....	5
2.0 DISCUSSION OF RESULTS.....	7
2.1 SITE DESCRIPTION OF THE USPCC FACILITY.....	7
2.2 ASBESTOS INSPECTION RESULTS.....	7
3.0 RECOMMENDATIONS AND ABATEMENT COST ESTIMATES.....	11
3.1 ASBESTOS-CONTAINING MATERIALS.....	11

## **FIGURE**

Drawings Showing ACM Sample Location

## **TABLES**

- 1 Bulk Data Summary of Suspect ACM
- 2 Inventory of ACM
- 3 Abatement Cost Estimate for ACM

## **APPENDICES**

- A Laboratory Reports for PLM Analyses of Suspect ACM
- B Asbestos Field Forms
- C Building 9 Photographs

## **EXECUTIVE SUMMARY**

BHE Environmental, Inc. (BHE) conducted a detailed survey for suspect asbestos-containing materials (ACM) in the United States Playing Card Company (USPCC) Facility located 4590 Beech Street, Cincinnati, Ohio.

This project is in support of USPCC efforts to develop an asbestos management plan for its facility in Cincinnati. The purpose of this survey was to identify the types, locations, quantities, and condition of asbestos-containing materials in the Beech Street facility.

The most pertinent findings of the inspection are listed below:

### **Asbestos-containing Materials**

#### ***Building 1***

- Aircell-pipe insulation throughout the building
- Cementitious fittings on fiberglass lines throughout the building
- Layered-paper pipe insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Window caulking throughout the building

#### ***Building 2***

- Layered-paper pipe insulation throughout the building
- Floor tile under carpet throughout the building
- Radiator heat shield throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking and glazing throughout the building

#### ***Building 3***

- 12 in. x 12 in. floor tile throughout the building
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Window caulking throughout the building

#### ***Building 4***

- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building
- Window caulking throughout the building

***Building 5***

- Aircell-pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building

***Building 6***

- Preformed-block pipe insulation throughout the building

***Building 6A***

- 9 in. x 9 in. floor tile and floor tile under carpet throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Lining of radiator covers throughout the building

***Building 7***

- 9 in. x 9 in and 12 in. x 12 in. floor tile throughout the building
- Linoleum throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Aircell-duct insulation throughout the building

***Building 8***

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

***Building 9***

- Preformed-block tank insulation
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Transite panel behind electric breakers
- Caulking on boilers
- Preformed brick on boilers
- Preformed-block insulation on boiler breeching inside and outside the building
- Boiler door gasket
- Window caulking throughout the building

***Building 10***

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

***Building 13***

- Window caulking throughout the building

***Building 15***

- Aircell-pipe insulation throughout the building

***Building 18***

- Window glazing throughout the building

A summary of the sampling locations and analytical results for suspect ACM is presented in Table 1. Copies of the analytical reports for the polarized-light microscopy (PLM) analyses are presented as Appendix A. Quantities of suspect and confirmed ACMs in each room or building area can be found on the individual Asbestos Field Forms compiled in Appendix B.

An inventory, by building, of the types and estimated quantities of ACM identified is presented in Table 2. Abatement cost estimates for removal are presented in Table 3.



## **1.0 INTRODUCTION**

BHE conducted a detailed asbestos-materials survey of the USPCC facility in Cincinnati, Ohio, between May and June 2002. The purpose of this survey was to identify the types, locations, quantities, and conditions of both friable and nonfriable ACMs in all designated USPCC buildings and structures. With this knowledge about ACMs throughout the facility, the USPCC can implement an effective asbestos management program in which sources of potential asbestos exposure are eliminated or controlled and appropriate asbestos controls and removal procedures are implemented prior to planned renovations, maintenance, or future demolition activities that could disturb the identified ACM..

This report presents descriptions of the inspection, sampling, and analytical methods used, the results of the ACM survey and material assessments, and managing the ACMs identified.

### **1.1 BUILDING INSPECTION**

The building survey was scheduled and coordinated through Mr. Arthur Thomas, USPCC Director of Industrial Engineering, and Mr. Trung Nguyen, Senior Project Manager. Mr. Dave Gregory and Mr. Rob Wilmot, both EPA-accredited Building Inspectors and Management Planners and Ohio-Certified Asbestos Hazard Abatement/Evaluation Specialists conducted the ACM surveys. Mr. Mark Karaffa, CIH, served as the BHE Project Manager

Upon arrival, the inspection team conducted a walk-through survey to identify suspect ACM, using building floor plans provided by USPCC of each building. This information helped to familiarize the inspectors with the facility and with the locations of various building components.

Because much of the USPCC facility is occupied, destructive inspection and sampling procedures to ascertain the possible presence of ACM behind intact walls and enclosed ceiling systems were not conducted. Also, to preserve the integrity of the existing roof system and to not void any existing warranties, BHE did not collect or analyze samples of suspect asphalt-based roofing materials. Asphalt-based roofing materials were assumed to be ACM.

## **1.2 ASBESTOS INSPECTION**

BHE conducted a detailed asbestos inspection of the USPCC facility. All accessible areas were visually checked and samples of suspect ACM were collected.

During the building inspection, BHE searched for suspect ACMs such as thermal system insulation on hot water/steam distribution lines, tanks, and boilers; suspended ceiling panels; acoustical ceiling tiles; and resilient floor coverings, etc., that could contain asbestos. Suspect materials were touched to determine their degree of friability and homogeneous sampling areas were identified. BHE used standard Asbestos Field Forms and building drawings to record pertinent information about the material and the building environment.

### **Sampling Methods**

To avoid disturbing suspect ACM any more than necessary and to minimize the release of asbestos fibers, BHE performed bulk sampling of suspect materials in accordance with generally accepted procedures outlined in the current Environmental Protection Agency (EPA) guidance documents. Each sample was collected and placed in a clean, sealable plastic container and labeled with a unique sample identification number. This sample number was recorded on a Bulk Sample Log Sheet, the sample container, and at the sample location. Supplemental information was also recorded on the Bulk Sample Log Sheet including the date of the inspection, the name of the inspector, the building name, a brief description of the sample, the exact sampling location, and the type of material sampled (e.g., thermal insulation, ceiling tile, etc.).

BHE collected over 400 samples of suspect ACM. To help reduce the analytical costs, the lab was directed to stop analyzing samples from a homogeneous suspect material as soon as one positive analysis confirmed an asbestos content  $>1\%$ .

## **1.3 ANALYTICAL METHODS**

### **Polarized-light Microscopy**

The samples selected were submitted periodically throughout the survey to Analytica Solutions, Inc., Thornton, Colorado, for analysis by polarized-light microscopy (PLM) with dispersion

staining in accordance with the prescribed EPA analytical protocol (40 CFR Part 263, Appendix A to Subpart F).

This analytical method, which the EPA currently recommends for the determination of asbestos in bulk samples of friable insulation materials, is used for the qualitative identification of six morphologically different types of asbestos fibers: chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite asbestos.

The method specifies that the asbestos content in a bulk sample be determined by visual estimation and reported as a finite percentage (rounded to the nearest percent) within the range of 0 to 100. Minute quantities of asbestos in bulk samples may be reported as "trace" (tr) or less than 1%. The analytical method determines the "area percent" asbestos or the percentage of the area of a microscopic field of view that is occupied by asbestos fibers.

The EPA and the Occupational Safety and Health Administration (OSHA) define ACM as any material that contains more than 1% asbestos.

The Analytica Solutions laboratory is accredited for asbestos bulk analyses by the National Institute of Standards and Technology (NIST) under its National Voluntary Laboratory Accreditation Program (NVLAP) No. 101086. NVLAP is the quality assurance program for laboratories analyzing bulk samples for asbestos content by PLM.

A summary of the sampling locations and analytical results for suspect ACM is presented in Table 1. Bulk sample locations are presented in Figure 1 on individual building maps as a separate attachment. Copies of the analytical reports for the PLM analyses are presented in Appendix A.

An inventory of types and estimated quantities of identified ACM, by building and abatement cost estimates, are presented in Table 2.

## **2.0 DISCUSSION OF RESULTS**

### **2.1 SITE DESCRIPTION OF THE USPCC FACILITY**

The USPCC facility in Cincinnati, Ohio, consists of 14 buildings. The buildings are comprised of various types of building construction. Each room/area within each building was inspected. The inspector recorded relevant room information on an Asbestos Field Form, noting room size and suspect ACM with approximate quantities. Rooms and areas that were not accessible during the inspection were noted on the form. Asbestos Field Forms listing all the suspect ACMs in each room in each building are included in Appendix B of this report.

### **2.2 ASBESTOS INSPECTION RESULTS**

#### **ACM Identified**

The following ACM were identified (with confirmatory PLM analyses) at the USPCC facility. The following information contains brief descriptions of each ACM identified.

#### ***Building 1***

- Aircell-pipe insulation throughout the building
- Cementitious fittings on fiberglass lines throughout the building
- Layered-paper pipe insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Window caulking throughout the building

#### ***Building 2***

- Layered-paper pipe insulation throughout the building
- Floor tile under carpet throughout the building
- Radiator heat shields throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking and glazing throughout the building

#### ***Building 3***

- 12 in. x 12 in. floor tile throughout the building
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Window caulking throughout the building

#### ***Building 4***

- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building

- Window caulking throughout the building

#### ***Building 5***

- Aircell-pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building

#### ***Building 6***

- Preformed-block pipe insulation throughout the building

#### ***Building 6A***

- 9 in. x 9 in. floor tile and floor tile under carpet throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Lining of radiator cover throughout the building

#### ***Building 7***

- 9 in. x 9 in. and 12 in. x 12 in. floor tile throughout the building
- Linoleum throughout the building
- Preformed-block pipe insulation throughout the building
- Aircell-pipe insulation throughout the building
- Window caulking throughout the building
- Layered-paper pipe insulation throughout the building
- Tarred tape pipe wrap insulation throughout the building
- Aircell-duct insulation throughout the building

#### ***Building 8***

- Aircell-pipe insulation throughout the building
- Window caulking throughout the building

#### ***Building 9***

- Preformed-block tank insulation
- Preformed-block pipe insulation throughout the building
- Layered-paper pipe insulation throughout the building
- Transite panel
- Caulking on boilers
- Preformed brick on boilers
- Preformed-block insulation on boiler breeching inside and outside the building
- Boiler door gasket
- Window caulking throughout the building

#### ***Building 10***

- Aircell-pipe insulation throughout the building

- Window caulking throughout the building

#### ***Building 13***

- Window caulking throughout the building

#### ***Building 15***

- Aircell-pipe insulation throughout the building

#### ***Building 18***

- Window glazing throughout the building

The locations of all ACM at the USPCC are shown on building floor plans.

#### **Non-ACM Identified**

Asbestos was not detected by PLM analysis in the following suspect materials:

#### ***Building 1***

- 12 in. x 12 in. gray with white blotches floor tile
- 12 in. x 12 in. gray with gray and white blotches floor tile
- 12 in. x 12 in. gray with tan blotches floor tile
- 2 ft. x 4 ft. suspended ceiling tile with random fissures
- 2 ft. x 4 ft. suspended ceiling tile with dot pattern
- Fiberboard inside dryers on the 4th floor
- Hard plaster walls
- Drywall joint compound
- Window glazing

#### ***Building 2***

- Drywall joint compound
- 12 in. x 12 in. gray marbled floor tile
- 15 in. x 15 in. white with black and gray spots floor tile
- 15 in. x 15 in. dark gray with black and gray spots floor tile
- White linoleum floor covering with pebble pattern
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- 2 ft. x 2 ft. suspended ceiling tiles with random fissures
- 2 ft. x 4 ft. suspended ceiling tiles with random fissures
- 12 in. x 12 in. acoustical ceiling tiles with deep fissures
- 12 in. x 12 in. acoustical ceiling tiles with random dot pattern
- 15 in. x 15 in. acoustical ceiling tile with smooth finish

#### ***Building 3***

- 12 in. x 12 in. gray with gray and white blotches floor tile
- 12 in. x 12 in. beige with tan and white blotches floor tile

- 12 in. x 12 in. gray with white blotches floor tile
- 12 in. x 12 in. dark gray with white blotches floor tile
- Hard plaster walls
- Fiberboard ceiling
- Cementitious fittings on fiberglass lines
- Drywall joint compound
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- 2 ft. x 4 ft. suspended ceiling panels with dot pattern
- 2 ft. x 4 ft. suspended ceiling panels with smooth finish, drywall panels
- 12 in. x 12 in. acoustical ceiling tiles with indented pattern
- Green speckled linoleum floor covering
- Window glazing

#### ***Building 4***

- 12 in. x 12 in. acoustical ceiling tiles with slots and associated mastic (hockey pucks)
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- Hard plaster
- Fiberboard
- Window glazing

#### ***Building 5***

- Hard plaster
- Drywall/joint compound

#### ***Building 6***

- Drywall/joint compound
- Hard plaster
- 12 in. x 12 in. acoustical ceiling tiles with smooth finish

#### ***Building 6A***

- 12 in. x 12 in. gray with blue and white spots floor tile
- 12 in. x 12 in. white with black streaks floor tile
- 12 in. x 12 in. 23 acoustical ceiling tiles with dot pattern
- Hard plaster
- 20 in. x 20 in. acoustical ceiling tiles with smooth finish
- 2 ft. x 2 ft. suspended ceiling tiles with rough texture
- 12 in. x 12 in. acoustical ceiling tile with random dots
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- Cementitious fittings on fiberglass lines
- Window glazing

#### ***Building 7***

- 12 in. x 12 in. acoustical ceiling tile with slot pattern
- 2 ft. x 4 ft. suspended ceiling panels with random fissures
- 12 in. x 12 in. acoustical ceiling tile with deep fissures

- 12 in. x 12 in. acoustical ceiling panels, lateral fissures
- 2 ft. x 4 ft. suspended ceiling tiles with lateral fissure
- 12 in. x 12 in. acoustical ceiling tiles with dot pattern
- Hard plaster
- Mastic on acoustical ceiling tiles (hockey pucks)
- Drywall/joint compound (confirmed by point-count analysis of composite sample)
- Window glazing

#### ***Building 8***

- Window glazing

#### ***Building 9***

- Fittings on fiberglass lines
- Window glazing

#### ***Building 10***

- 2 ft. x 4 ft. suspended ceiling panels with long random fissures
- 2 ft. x 4 ft. suspended ceiling panels with small deep random fissures
- 2 ft. x 4 ft. suspended ceiling panels with a smooth finish
- Window glazing

#### ***Building 13***

- Window glazing
- Building 15
- Rolled in building insulation
- Drywall/joint compound

#### ***Building 18***

- Window glazing

### **3.0 RECOMMENDATIONS AND ABATEMENT COST ESTIMATES**

#### **3.1 ASBESTOS-CONTAINING MATERIALS**

The condition of the ACM material was rated on a scale of: good, damaged, or significantly damaged. Most ACM found in all buildings was in good to damaged condition. The following notes regarding damaged or significantly damaged ACM were made by the inspector for the following buildings:



## **All Buildings**

The condition of window caulking around the windows of most buildings ranged from good to significantly damaged condition. BHE recommends that a licensed asbestos abatement contractor or asbestos trained renovation contractor repair the damaged caulking on windows with significant damage.

## **Tunnels**

The inspector noted aircell pipe insulation debris in the tunnels from Building 1 to Building 9 and from Buildings 7 to Building 9. BHE recommends that a licensed abatement contractor clean up the debris and repair the damaged pipe insulation in the tunnels.

## **Overhead Walkway**

The inspector noted 65 linear feet of significantly damaged layered-paper pipe insulation on the overhead walkway between Buildings 3 and 9.

## **Building 1**

Approximately 25 linear feet of damaged pipe insulation was noted by the inspector in Room 2 behind the cooker machine. This insulation is in an area occupied by employees that operate the cooker machine. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

## **Building 2**

The inspector noted approximately 150 linear feet of damaged layered-pipe insulation in Building 2, Room 41 on the first floor, and 30 linear feet in Room 8 on the fourth floor. BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

## **Building 3**

The inspector noted damaged layered-paper-pipe insulation in the following locations:

- Approximately 20 linear feet of damaged layered pipe insulation in Room 46 on the first floor
- Approximately 10 linear feet in Rooms 56/57 on the third floor
- Approximately 5 linear feet in Room 52 on the fourth floor

BHE recommends that a licensed asbestos abatement contractor repair or remove this damaged pipe insulation.

#### **Building 4**

The inspector noted approximately 250 square feet of damaged floor tile in Room 11 on the first floor. BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile. The inspector noted approximately 10 linear feet of damaged preformed-block pipe insulation in Room 7 on the second floor. BHE recommends that a licensed asbestos abatement contractor repair the damaged piping.

#### **Building 6A**

The inspector noted damaged layered-paper pipe insulation in the following locations:

- Approximately 20 linear feet of in Room 48 on the first floor
- Approximately 10 linear feet in Room 46 of the first floor

The inspector noted significantly damaged layered-paper pipe insulation in the following location:

- Approximately 30 linear feet of layered pipe insulation in Room 4 on the third floor

The inspector noted significant damage on aircell pipe insulation in the following locations:

- Approximately 20 linear feet of aircell-pipe insulation in Room 46 of the first floor
- Approximately 30 linear feet of aircell-pipe insulation in Room 4 on the third floor

BHE recommends that a licensed asbestos abatement contractor repair or remove the damaged pipe insulation.

#### **Building 7**

The inspector noted significantly damaged floor tile in the following locations:

- Approximately 1,125 square feet Room 1 in the basement
- Approximately 70 square feet in Room 41 on the first floor
- Approximately 150 square feet of damaged tile in Room 76 on the first floor
- Approximately 40 linear feet in Room 26 on the second floor
- Approximately 2000 square feet of floor tile in Room 20 on the third floor. The inspector noted that the floor tile was being run over daily by hand trucks.

BHE recommends that a licensed asbestos abatement contractor remove the damaged floor tile.

The inspector noted damaged preformed-block pipe insulation in the following locations:

- Approximately 15 linear feet of damaged was found in Room 12
- Approximately 80 linear feet in Room 15 of the first floor
- Approximately 10 linear feet in Room 22 of the third floor

The inspector noted damaged layered-paper pipe insulation in the following locations:

- Approximately 10 linear feet of damaged layered-pipe insulation in Room 26 on the second floor

BHE recommends that a licensed asbestos contractor repair or remove the damaged insulation.

### **Building 8 ✕**

The inspector noted damaged aircell-pipe insulation in Building 8 (abandoned and unoccupied building). Pipe insulation was seen on the dirt floor of the crawl space on the west end of the building. The damaged insulation was wet apparently from water that has leaked through the damaged roof. BHE understands that USPCC is considering demolishing this building. State regulations require that all regulated ACM be removed prior to the building being demolished. BHE recommends that a licensed asbestos abatement contractor remove RACM prior to building demolition.

### **Building 9 ✕**

The inspector noted Building 9 (Powerhouse) with having the most damaged ACM material. Tanks with preformed-block insulation and insulated piping in the building are significantly damaged. Tank insulation was exposed without jacketing and insulation debris from some tanks was lying on the floor. Pipe insulation was also exposed in some areas with insulation lying on the floor. Preformed-block insulation debris from boilers was also found in Building 9. Photographs depicting some of the damaged ACMs in Building 9 were taken and presented in Appendix C. The inspectors recommend this building receive top priority for corrective action. BHE recommends that a licensed asbestos abatement contractor cleanup, remove, or repair the damaged ACM in Building 9. All significantly damaged ACM should be removed (ie., non-repairable).

## **Buildings 15 & 18 ✕**

Damaged and significantly damaged aircell-pipe insulation was identified in Buildings 15 and 18. The inspector noted that most insulation from the piping was on the ground. BHE recommends that a licensed asbestos abatement contractor cleanup the pipe insulation debris.

## **Asphalt-based Roofing Material, Floor Tile, and Mastic ✕**

Asphalt-based roofing materials and resilient floor coverings, such as floor tile and linoleum, are considered nonfriable when in good condition and not damaged. Currently, asbestos-containing asphalt-based roofing and resilient floor coverings such as floor tile, in good condition, are not considered regulated asbestos-containing material (RACM) per revised EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations of November 20, 1990. This is because the asbestos fibers are tightly bound in an asphalt or vinyl matrix and are not readily released into the air. Nonfriable asbestos-containing roofing and floor tile are classified as "Category I nonfriable ACM."

The State of Ohio does not require that these materials be removed from buildings prior to demolition. However, any renovation activities that would subject the ACM to abrasive forces (such as sanding, cutting, or grinding) could render the ACM friable and, therefore, result in the floor tile and or roofing becoming RACM subject to the NESHAP regulations.

When planning renovation activities, asbestos-containing roofing materials, linoleum, and floor tile and mastic should be considered carefully to ensure that they are not disturbed. If these materials will be affected by subsequent renovation, they should be removed properly by specially trained and equipped workers (usually a licensed asbestos abatement contractor) before construction or interior demolition work begins. Although a licensed asbestos abatement contractor is not required for the removal of Category I nonfriable materials (provided they are non-friable and in good condition), contractors working with these materials must comply with the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) which has specific training requirements and work practices for construction or maintenance work involving the removal of Category I nonfriable materials.

The estimated asbestos removal costs presented in Table 3 are based on the estimated quantities of ACM and an average of current unit-price quotations from local asbestos abatement

contractors. The estimate is provided as an indication of typical costs for asbestos abatement and is intended for use as a planning tool. Actual bid prices from contractor for asbestos removal can be extremely variable.

Qualified independent third party industrial hygienists and project monitors are recommended to oversee contractor performance and to ensure that the asbestos is removed in a safe and compliant manner and disposed properly in accordance with the project specifications and applicable federal, state, and local asbestos regulations. A rough "ball park" estimate for third party oversight and air monitoring is also presented; however, actual costs for third party oversight will depend on the project schedule and scope, length and number of work shifts, and the duration of the abatement project.

### **Employee Training Including Operations and Maintenance Work**

Currently, the OSHA asbestos standard for the construction industry (29 CFR 1926.1101) defines four classes of work involving ACM and has specific training requirements for each class.

Removal of asbestos-containing thermal system insulation or surfacing materials is considered "Class I asbestos work." OSHA requires that employees performing Class I operations receive the four-day EPA AHERA asbestos abatement worker training. Class I asbestos work should be conducted by a licensed asbestos abatement contractor.

Removal of asbestos-containing wallboard, resilient floor coverings, roofing and siding shingles, and construction mastics is considered "Class II asbestos work." OSHA requires that employees performing Class II operations also receive the four-day EPA AHERA asbestos abatement worker training.

X Repair and maintenance operations, where thermal system insulation and surfacing material is likely to be disturbed, are considered "Class III asbestos work." OSHA requires that employees performing Class III operations receive the EPA 16-hour Operations and Maintenance (O&M) training course, including hands-on training on respirators and work practices.

Maintenance and custodial activities during which employees contact ACM (but do not disturb it) and activities to clean up waste and debris containing ACM are considered "Class IV asbestos work." OSHA requires that employees performing Class IV operations receive the EPA two-

hour awareness training. This course should include instruction on the locations of ACM and on the recognition of damage, deterioration, or delamination of ACM. Class IV work must be overseen by a competent person who has received at least the two-day O&M training course.

BHE recommends that any workers performing Class II, III, or IV operations receive the appropriate training to reduce the risk of worker or occupant exposure to asbestos fibers during routine or emergency maintenance operations.

## **FIGURES**

Drawings Showing ACM Sample Location

## **TABLES**

- 1 Bulk Data Summary of Suspect ACM
- 2 Inventory of ACM
- 3 Abatement Cost Estimate for ACM



**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

I.D.	SAMPLED MATERIAL	% ASBESTOS
<b>BUILDING #1</b>		
USPC-1-69	Aircell Pipe Insulation (grayish tan, with black felt)	15.0% Chrysotile
USPC-1-70		NA
USPC-1-92		NA
USPC-1-72	2x4 Suspended Ceiling Panel, Random Fissures (white)	ND
USPC-1-80		ND
USPC-1-86	2'x4' Suspended ceiling panels with dot pattern (white)	ND
USPC-1-87		ND
USPC-1-73	Fitting on Fiberglass Line (white, with foil/paper/woven wrap)	ND
USPC-1-78		ND
USPC-1-89		20.0% Chrysotile
USPC-1-77	Preformed Block Pipe Insulation (white, with woven wrap)	ND
USPC-1-90		25.0% Chrysotile 5.0% Crocidolite
USPC-1-97		NA
USPC-1-79	Layered Paper Pipe Insulation (grayish tan, with black felt)	5.0% Chrysotile
USPC-1-91		NA
USPC-1-81*	Fiberboard (2 parts)	ND
USPC-1-81 (A)	Tan fiberboard	ND
USPC-1-81 (B)	Silver paint	ND
USPC-1-82*	Fiberboard (2 parts)	ND
USPC-1-82 (A)	Tan fiberboard	ND
USPC-1-82 (B)	Silver paint	ND
USPC-1-93*	Drywall/joint compound (3 parts)	ND
USPC-1-93 (A)	White drywall	ND
USPC-1-93 (B)	White joint compound	ND
USPC-1-93 (C)	White tape	ND
USPC-1-103*	Drywall/joint compound (3 parts)	ND
USPC-1-103 (A)	White drywall	ND
USPC-1-103 (B)	White joint compound	ND
USPC-1-103 (C)	White tape	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-1-84*	12"x12" Gray with gray & white blotches (2 parts)	ND
USPC-1-84 (A)	White floor tile	ND
USPC-1-84 (B)	Tan mastic	ND
USPC-1-95*	12"x12" Gray with gray & white blotches (2 parts)	ND
USPC-1-95 (A)	White floor tile	ND
USPC-1-95 (B)	Tan mastic	ND
USPC-1-94*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-1-94 (A)	Gray floor tile	ND
USPC-1-94 (B)	Tan mastic	ND
USPC-1-98*	12"x12" floor tile, white with tan blotches (2 parts)	ND
USPC-1-98 (A)	White floor tile	ND
USPC-1-98 (B)	Tan mastic	ND
USPC-1-99*	12"x12" floor tile, white with tan blotches (2 parts)	ND
USPC-1-99 (A)	White floor tile	ND
USPC-1-99 (B)	Tan mastic	ND
USPC-1-101*	12"x12" floor tile gray with white blotches (2 parts, sample inconsistent with previous sample)	ND
USPC-1-101 (A)	Gray floor tile	ND
USPC-1-101 (B)	Black mastic	ND
USPC-1-104	Hard plaster wall (white)	ND
USPC-1-105	Hard plaster wall (white)	ND
USPC-1-106	Hard plaster wall (white)	ND
USPC-1-107	Layered paper pipe insulation (group method)	NA
USPC-1-410	Window glazing (tannish white)	ND
USPC-1-411	Window caulking (brown)	5.0% Chrysotile
USPC-1-413	Window caulking (group method)	NA
USPC-1-414	Window glazing (tannish white)	Tr <1.0% Chrysotile
<b>BUILDING #2</b>		
USPC-2-354*	Layered paper pipe insulation (3 parts)	ND
USPC-2-354 (A)	Tan insulation	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-2-354 (B)	Black felt	ND
USPC-2-354 (C)	Gray painted wrap	ND
USPC-2-356*	Layered paper pipe insulation (3 parts)	7.8% Chrysotile
USPC-2-356 (A)	Gray insulation	ND
USPC-2-356 (B)	Black felt	65.0% Chrysotile
USPC-2-356 (C)	White painted wrap	ND
USPC-2-387*	Layered paper pipe insulation (2 parts)	ND
USPC-2-387 (A)	Gray tan insulation	ND
USPC-2-387 (B)	Gray painted wrap	ND
USPC-2-355*	Drywall/joint compound	ND
USPC-2-355 (A)	White/tan drywall	ND
USPC-2-355 (B)	White joint compound with woven tape and paint	ND
USPC-2-398*	Drywall/joint compound	ND
USPC-2-398 (A)	White/tan drywall	ND
USPC-2-398 (B)	White joint compound with paint	ND
USPC-2-400*	Hard plaster (2 parts)	ND
USPC-2-400 (A)	Gray plaster	ND
USPC-2-400 (B)	White plaster	ND
USPC-2-417	Window caulking (brown)	25.0% Chrysotile
USPC-2-418	Window glazing (off-white)	10.0% Chrysotile
USPC-2-420	Window glazing (group method)	NA
USPC-2-421	Window caulking (group method)	NA
USPC-2-358*	12"x12" gray marbled floor tile (2 parts)	ND
USPC-2-358 (A)	Gray floor tile	ND
USPC-2-358 (B)	Yellow mastic	ND
USPC-2-360*	15"x15" floor tile, white with black and gray spots (2 parts)	ND
USPC-2-360 (A)	Grayish white vinyl flooring	ND
USPC-2-360 (B)	Clear mastic	ND
USPC-2-361*	15"x15" floor tile, white with black and gray spots (2 parts)	ND
USPC-2-361 (A)	Grayish white vinyl flooring	ND
USPC-2-361 (B)	Clear mastic	ND
USPC-2-363*	15"x15" floor tile, dark gray with black and gray spots (2 parts)	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-2-363 (A)	Gray/white speck rubber flooring	ND
USPC-2-363 (B)	Clear mastic	ND
USPC-2-364*	15"x15" floor tile, dark gray with black and gray spots (2 parts)	ND
USPC-2-364 (A)	Gray/white speck rubber flooring	ND
USPC-2-364 (B)	Clear mastic	ND
USPC-2-366*	Unknown floor tile under carpet (3 parts)	38.3% Chrysotile
USPC-2-366 (A)	Green floor tile	40.0% Chrysotile
USPC-2-366 (B)	Black mastic	10.0% Chrysotile
USPC-2-366 (C)	Tan mastic	ND
USPC-2-368*	Unknown floor tile under carpet (3 parts)	39.0% Chrysotile
USPC-2-368 (A)	Green floor tile	40.0% Chrysotile
USPC-2-368 (B)	Black mastic	8.0% Chrysotile
USPC-2-368 (C)	Tan mastic	ND
USPC-2-391*	9"x9" floor tile, brown with white and brown streaks (2 parts)	20.1% Chrysotile
USPC-2-391 (A)	Dark brown floor tile	20.0% Chrysotile
USPC-2-391 (B)	Black mastic	25.0% Chrysotile
USPC-2-392	9"x9" floor tile, brown with white and brown streaks (group method)	NA
USPC-2-394*	12"x12" floor tile, gray marbled (2 parts)	ND
USPC-2-394 (A)	Gray floor tile	ND
USPC-2-394 (B)	Tan mastic	ND
USPC-2-407*	Linoleum, white pebble pattern (2 parts)	ND
USPC-2-407 (A)	Beige/off-white pebble linoleum)	ND
USPC-2-407 (B)	Tan mastic with black material	ND
USPC-2-408*	Linoleum, white pebble pattern (2 parts)	ND
USPC-2-408 (A)	White pebble linoleum	ND
USPC-2-408 (B)	Tan mastic with black material	ND
USPC-2-371	Fitting on fiberglass line (grayish white insulation with woven wrap)	ND
USPC-2-405		ND
USPC-2-406		ND
USPC-2-372	Radiator heat shield (white ins.)	75.0% Chrysotile
USPC-2-373	Radiator heat shield (group method)	NA

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-2-374	Radiator heat shield (group method)	NA
USPC-2-375	12"x12" acoustical ceiling tile, dot pattern (white/tan)	ND
USPC-2-376		ND
USPC-2-378	2'x4' suspended ceiling panels, random fissure (white/gray)	ND
USPC-2-396		ND
USPC-2-379	12'x12" acoustical ceiling tiles, deep fissures (white)	ND
USPC-2-395		ND
USPC-2-381	12"x12" acoustical ceiling tile, random dot pattern (white/tan)	ND
USPC-2-382		ND
USPC-2-384	15"x15" acoustical ceiling tile, smooth finish (white/tan)	ND
USPC-2-385		ND
USPC-2-388	2'x2' suspended ceiling panels, random fissures (white/gray)	ND
USPC-2-389		ND
USPC-2-357	Aircell pipe insulation (white painted)	65.0% Chrysotile
USPC-2-369		NA
USPC-2-370		NA
USPC-2-400*	Hard Plaster (2 parts)	ND
USPC-2-400 (A)	Gray plaster	ND
USPC-2-400 (B)	White plaster	ND
USPC-2-401*	Hard plaster (2 parts)	ND
USPC-2-401 (A)	Gray plaster	ND
USPC-2-401 (B)	White plaster	ND
USPC-2-402*	Hard plaster (2 parts)	ND
USPC-2-402 (A)	Gray plaster	ND
USPC-2-402 (B)	White plaster	ND
USPC-2-403*	Hard plaster (2 parts)	ND
USPC-2-403 (A)	Gray plaster	ND
USPC-2-403 (B)	White plaster	ND
USPC-2-404*	Hard plaster (2 parts)	ND
USPC-2-404 (A)	Gray plaster	ND
USPC-2-404 (B)	White plaster	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
<b>BUILDING #2</b>		
USPC-3-108*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-108 (A)	Gray/blue floor tile	ND
USPC-3-108 (B)	Yellow mastic	ND
USPC-3-114*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-114 (A)	Gray/blue floor tile	ND
USPC-3-114 (B)	Yellow mastic	ND
USPC-3-129*	12"x12" floor tile, beige with brown and white spots (2 parts)	19.8% Chrysotile
USPC-3-129 (A)	Tan floor tile	20.0% Chrysotile
USPC-3-129 (B)	Tan mastic	ND
USPC-3-130*	12"x12" floor tile, beige with brown and white spots (2 parts)	19.8% Chrysotile
USPC-3-130 (A)	Tan floor tile	20.0% Chrysotile
USPC-3-130 (B)	Tan mastic	ND
USPC-3-135*	12"x12" floor tile, beige with tan and white blotches (2 parts)	ND
USPC-3-135 (A)	Tan floor tile	ND
USPC-3-135 (B)	Tan mastic	ND
USPC-3-136*	12"x12" floor tile, beige with tan and white blotches (2 parts)	ND
USPC-3-136 (A)	Tan floor tile	ND
USPC-3-136 (B)	Tan mastic	ND
USPC-3-138*	12"x12" floor tile, blue with black and white streaks (2 parts)	2.0% Chrysotile
USPC-3-138 (A)	Blue floor tile	2.0% Chrysotile
USPC-3-138 (B)	Tan mastic	ND
USPC-3-139*	12"x12" floor tile, blue with black and white streaks (2 parts)	2.0% Chrysotile
USPC-3-139 (A)	Blue floor tile	2.0% Chrysotile
USPC-3-139 (B)	Tan mastic	ND
USPC-3-141*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-141 (A)	Blue floor tile	ND
USPC-3-141 (B)	Tan mastic	ND
USPC-3-142*	12"x12" floor tile, gray with white blotches (2 parts)	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-3-142 (A)	Tan floor tile	ND
USPC-3-142 (B)	Tan mastic	ND
USPC-3-151*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-151 (A)	Gray floor tile	ND
USPC-3-151 (B)	Tan mastic	ND
USPC-3-112*	Hard plaster wall (2 parts)	ND
USPC-3-112 (A)	Gray plaster	ND
USPC-3-112 (B)	White plaster	ND
USPC-3-113*	Hard plaster wall (2 parts)	ND
USPC-3-113 (A)	Gray plaster	ND
USPC-3-113 (B)	White plaster	ND
USPC-3-132	Fiberboard (tan)	ND
USPC-3-133	Fiberboard (tan)	ND
USPC-3-111*	Preformed block pipe insulation (2 parts)	9.0% Amosite 9.0% Chrysotile
USPC-3-111 (A)	White insulation	10.0% Amosite 10.0% Chrysotile
USPC-3-111 (B)	Tan woven mat	ND
USPC-3-117*	Preformed block pipe insulation (2 parts)	9.0% Amosite 13.5% Chrysotile
USPC-3-117 (A)	White insulation	10.0% Amosite 15.0% Chrysotile
USPC-3-117 (B)	Tan woven mat	ND
USPC-3-128	Preformed block pipe insulation	10.0% Amosite 10.0% Chrysotile
USPC-3-119*	Fitting on F.G. line (2 parts)	ND
USPC-3-119 (A)	Tan insulation	ND
USPC-3-119 (B)	Tan woven mat	ND
USPC-3-120*	Fitting on fiberglass line (2 parts)	ND
USPC-3-120 (A)	Tan insulation	ND
USPC-3-120 (B)	Tan woven mat	ND
USPC-3-76	Layered paper pipe insulation (LPPI), 4 <sup>th</sup> fl. (grayish tan paper insulation with painted woven wrap)	15.0% Chrysotile
USPC-3-122	Layered paper pipe insulation (tan)	ND
USPC-3-123*	LPPI (2 parts)	9.0% Chrysotile
USPC-3-123 (A)	Tan paper insulation	ND
USPC-3-123 (B)	Gray paper insulation	30.0% Chrysotile

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-3-118*	Drywall/joint compound (3 parts)	ND
USPC-3-118 (A)	White drywall	ND
USPC-3-118 (B)	White joint compound	ND
USPC-3-118 (C)	White drywall tape	ND
USPC-3-124*	Drywall/joint compound	ND
USPC-3-124 (A)	White drywall	ND
USPC-3-124 (B)	White joint compound	ND
USPC-3-124 (C)	White drywall tape	ND
USPC-3-125*	Hard plaster wall (2 parts)	ND
USPC-3-125 (A)	Gray plaster	ND
USPC-3-125 (B)	White plaster	ND
USPC-3-126*	Hard plaster wall (2 parts)	ND
USPC-3-126 (A)	Gray plaster	ND
USPC-3-126 (B)	White plaster	ND
USPC-3-127*	Hard plaster wall (2 parts)	ND
USPC-3-127 (A)	Gray plaster	ND
USPC-3-127 (B)	White plaster	ND
USPC-3-109	2'x4' suspended ceiling panels, random fissures (white/gray)	ND
USPC-3-121		ND
USPC-3-144	2'x4' Suspended ceiling panels, dot pattern (white)	ND
USPC-3-145		ND
USPC-3-156	2'x4' Suspended ceiling panels, lateral fissure (white)	ND
USPC-3-157		ND
USPC-3-147	12"x12" Acoustical ceiling tile, indented pattern (tan)	ND
USPC-3-148		ND
USPC-3-150*	12"x12" floor tile, gray with white blotches (2 parts)	ND
USPC-3-150 (A)	Gray floor tile	ND
USPC-3-150 (B)	Tan mastic	ND
USPC-3-153*	Linoleum floor covering, green speckled pattern (2 parts)	ND
USPC-3-153 (A)	Gray linoleum	ND
USPC-3-153 (B)	Tan mastic	ND



**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-3-154*	Linoleum floor covering, green speckled pattern (2 parts)	ND
USPC-3-154 (A)	Gray linoleum	ND
USPC-3-154 (B)	Tan mastic	ND
USPC-3-422	Window glazing (of-white)	Tr <1.0% Chrysotile
USPC-3-423	Window caulking (white)	ND
USPC-3-424	Window glazing (white)	ND
USPC-3-425	Window caulking (brown)	15.0% chry
<b>BUILDING #4</b>		
USPC-4-74	Performed block pipe insulation, 4 <sup>th</sup> fl. (white fibrous insulation with painted woven wrap)	35.0% Chrysotile
USPC-4-75	Layered paper pipe insulation, 4 <sup>th</sup> fl. (tan paper insulation with painted woven wrap)	20.0% Chrysotile
USPC-4-191*	Aircell pipe insulation. (2 parts)	58.5% Chrysotile
USPC-4-191 (A)	White felt	65.0% Chrysotile
USPC-4-191 (B)	White woven wrap	ND
USPC-4-195*	Aircell pipe insulation (2 parts)	51.0% Chrysotile
USPC-4-195 (A)	White felt	60.0% Chrysotile
USPC-4-195 (B)	White woven wrap	ND
USPC-4-196*	Aircell P.I. (2 parts)	58.5% Chrysotile
USPC-4-196 (A)	White felt	65.0% Chrysotile
USPC-4-196 (B)	White woven wrap	ND
USPC-4-175	12"x12" Acoustical ceiling tiles with dot pattern	ND
USPC-4-176		ND
USPC-4-185	12"x12" Acoustical ceiling tile with slots	ND
USPC-4-186		ND
USPC-4-183	Ceiling tiles on walls (white)	ND
USPC-4-184	Ceiling tiles on walls (white)	ND
USPC-4-188*	Mastic on 12"x12" Acoustical ceiling tiles with slots (hockey pucks) (2 parts)	ND
USPC-4-188 (A)	Brown mastic	ND
USPC-4-188 (B)	Tan ceiling tile	ND
USPC-4-189*	Mastic on 12"x12" Acoustical ceiling tiles with slots (hockey pucks) (2 parts)	ND
USPC-4-189 (A)	Brown mastic	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-4-189 (B)	Tan ceiling tile	ND
USPC-4-178*	9"x9" Floor tile, gray with black and white streaks (3 parts)	35.7% Chrysotile
USPC-4-178 (A)	Gray floor tile	40.0% Chrysotile
USPC-4-178 (B)	Black felt	ND
USPC-4-178 (C)	Black mastic	10.0% Chrysotile
USPC-4-179*	9"x9" Floor tile, gray with black and white streaks (3 parts)	36.6% Chrysotile
USPC-4-179 (A)	Gray floor tile	40.0% Chrysotile
USPC-4-179 (B)	Black felt	ND
USPC-4-179 (C)	Black mastic	15.0% Chrysotile
USPC-4-197*	12"x12" Floor tile, blue with blue and black streaks (2 parts)	5.9% Chrysotile
USPC-4-197 (A)	Blue floor tile	6.0% Chrysotile
USPC-4-197 (B)	Black mastic	ND
USPC-4-198*	12"x12" Floor tile, blue with blue and black streaks (2 parts)	7.9% Chrysotile
USPC-4-198 (A)	Blue floor tile	8.0% Chrysotile
USPC-4-198 (B)	Black mastic	ND
USPC-4-181*	Hard plaster (2 parts)	ND
USPC-4-181 (A)	Gray/white material	ND
USPC-4-181 (B)	White material	ND
USPC-4-182*	Hard plaster (2 parts)	ND
USPC-4-182 (A)	Gray/white material	ND
USPC-4-182 (B)	White material	ND
USPC-4-192*	Hard plaster (2 parts)	ND
USPC-4-192 (A)	Gray/white material	ND
USPC-4-192 (B)	White material	ND
USPC-4-193*	Hard plaster (2 parts)	ND
USPC-4-193 (A)	Gray/white material	ND
USPC-4-193 (B)	White material	ND
USPC-4-194*	Hard plaster (3 parts)	ND
USPC-4-194 (A)	Gray/white material	ND
USPC-4-194 (B)	White material	ND
USPC-4-194 (C)	Tan sand plaster	15.0% Chrysotile
USPC-4-200	Fiberboard (tan)	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-4-201	Fiberboard (tan)	ND
USPC-4-429	Window caulking (brown)	8.0% Chrysotile
USPC-4-430	Window glazing (white)	ND
USPC-4-431	Window caulking (group method)	NA
USPC-4-432	Window glazing (white)	ND
<b>BUILDING #5</b>		
USPC-5-159	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-160	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-161	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-162	Hard plaster ceiling (white sand plaster)	Tr <1.0% Chrysotile
USPC-5-165	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-166	Hard plaster ceiling (white sand plaster)	ND
USPC-5-167	Hard plaster ceiling (tan sand plaster)	Tr <1.0% Chrysotile
USPC-5-163	Aircell P.I. (white)	45.0% Chrysotile
USPC-5-168	Aircell P.I. (group method)	NA
USPC-5-170*	Aircell P.I. (2 parts)	40.5% Chrysotile
USPC-5-170 (A)	White fibrous insulation	45.0% Chrysotile
USPC-5-170 (B)	White woven wrap	ND
USPC-5-164*	Drywall joint compound (3 parts)	ND
USPC-5-164 (A)	White drywall	ND
USPC-5-164 (B)	White joint compound	ND
USPC-5-164 (C)	Blue woven mat	ND
USPC-5-173*	Drywall joint compound (2 parts)	ND
USPC-5-173 (A)	White drywall	ND
USPC-5-173 (B)	White joint compound	ND
USPC-5-169*	Layered paper pipe insulation (2 parts)	14.0% Chrysotile
USPC-5-169 (A)	Tan paper insulation	ND
USPC-5-169 (B)	Black paper insulation	70.0% Chrysotile
USPC-5-171*	Layered paper pipe insulation (2 parts)	7.0% Chrysotile
USPC-5-171 (A)	Tan paper insulation	ND
USPC-5-171 (B)	Black paper insulation	ND
USPC-5-172	Layered paper pipe insulation (tan)	ND
<b>BUILDING #6</b>		
USPC-6-203*	Drywall/joint compound	ND
USPC-6-203 (A)	White drywall	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-6-203 (B)	White joint compound	ND
USPC-6-204*	Drywall/joint compound	ND
USPC-6-204 (A)	White drywall	ND
USPC-6-204 (B)	White joint compound	ND
USPC-6-206*	Hard plaster (3 parts)	ND
USPC-6-206 (A)	White plaster	ND
USPC-6-206 (B)	White material	ND
USPC-6-206 (C)	White material	ND
USPC-6-207*	Hard plaster (2 parts)	ND
USPC-6-207 (A)	Gray sand plaster	ND
USPC-6-207 (B)	White plaster	ND
USPC-6-208*	Hard plaster (3 parts)	ND
USPC-6-208 (A)	Gray vermiculitic plaster	ND
USPC-6-208 (B)	White plaster	ND
USPC-6-208 (C)	Tan mastic	ND
USPC-6-209	Hard plaster (gray vermiculitic plaster)	ND
USPC-6-210*	Hard plaster (2 parts)	ND
USPC-6-210 (A)	White plaster	ND
USPC-6-210 (B)	Gray vermiculitic plaster	ND
USPC-6-211	12"x12" Acoustical ceiling tile, smooth finish (white)	ND
USPC-6-212		ND
USPC-6-214*	Preformed block pipe insulation (2 parts)	8.0% Amosite 24.0% Chrysotile
USPC-6-214 (A)	White fibrous insulation	10.0% Amosite 30.0% Chrysotile
USPC-6-214 (B)	White woven wrap	ND
USPC-6-215*	Preformed block pipe insulation (2 parts)	13.5% Amosite 18.0% Chrysotile
USPC-6-215 (A)	White fibrous insulation	15.0% Amosite 20.0% Chrysotile
USPC-6-215 (B)	White woven wrap	ND
USPC-6-216*	Preformed block pipe insulation (2 parts)	13.5% Amosite 22.5% Chrysotile
USPC-6-216 (A)	White fibrous insulation	15.0% Amosite 25.0% Chrysotile
USPC-6-216 (B)	White woven wrap	ND
USPC-6-440	Window glazing (grayish white)	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-6-441	Window caulking (brown)	8.0% Chrysotile
USPC-6-442	Window glazing (tannish white)	ND
USPC-6-443	Window caulking (group method)	NA
<b>BUILDING #6A</b>		
USPC-6A-217	9"x9" Floor tile, painted gray (brown floor tile with gray paint and debris)	20.0% Chrysotile
USPC-6A-218	9"x9" Floor tile, painted gray (group method)	NA
USPC-6A-220*	12"x12" Floor tile, gray with blue and white spots (2 parts)	ND
USPC-6A-220 (A)	Gray/blue splotch floor tile	ND
USPC-6A-220 (B)	Yellow mastic	ND
USPC-6A-221*	12"x12" Floor tile, gray with blue and white spots (2 parts)	ND
USPC-6A-221 (A)	Gray/blue splotch floor tile	ND
USPC-6A-221 (B)	Yellow mastic	ND
USPC-6A-227*	Unknown floor tile under carpet 3 <sup>rd</sup> floor (3 parts)	19.4% Chrysotile
USPC-6A-227 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-227 (B)	Black mastic	20.0% Chrysotile
USPC-6A-227 (C)	Tan mastic	ND
USPC-6A-228*	Unknown floor tile under carpet 3 <sup>rd</sup> floor (2 parts)	19.6% Chrysotile
USPC-6A-228 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-228 (B)	Tan mastic	ND
USPC-6A-234*	Unknown floor tile under carpet 2 <sup>nd</sup> floor (3 parts)	34.0% Chrysotile
USPC-6A-234 (A)	Red floor tile	35.0% Chrysotile
USPC-6A-234 (B)	Tan mastic	ND
USPC-6A-234 (C)	Black mastic with inseparable gray material	ND
USPC-6A-235*	Unknown floor tile under carpet 2 <sup>nd</sup> floor (3 parts)	32.3% Chrysotile
USPC-6A-235 (A)	Red floor tile	33.0% Chrysotile
USPC-6A-235 (B)	Tan mastic	ND
USPC-6A-235 (C)	Black mastic with inseparable gray mastic	ND
USPC-6A-237*	9"x9" floor tile, maroon with white streaks (3 parts)	19.9% Chrysotile

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>ID.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-6A-237 (A)	Red floor tile	20.0% Chrysotile
USPC-6A-237 (B)	Black mastic	8.0% Chrysotile
USPC-6A-237 (C)	Tan mastic	ND
USPC-6A-238*	9"x9" floor tile, maroon with white streaks (2 parts)	14.9% Chrysotile
USPC-6A-238 (A)	Red floor tile	15.0% Chrysotile
USPC-6A-238 (B)	Tan mastic with inseparable gray material	ND
USPC-6A-250*	9"x9" floor tile, gray with black and white streaks (2 parts)	19.9% Chrysotile
USPC-6A-250 (A)	Brown floor tile	20.0% Chrysotile
USPC-6A-250 (B)	Black mastic	10.0% Chrysotile
USPC-6A-251	9"x9" floor tile, gray with black and white streaks (group method)	NA
USPC-6A-254*	12"x12" floor tile, white with black streaks (2 parts)	ND
USPC-6A-254 (A)	White floor tile	ND
USPC-6A-254 (B)	Black mastic	ND
USPC-6A-255*	12"x12" floor tile, white with black streaks (2 parts)	ND
USPC-6A-255 (A)	White floor tile	ND
USPC-6A-255 (B)	Tan mastic	ND
USPC-6A-223	12"x12" Acoustical ceiling tile, dot pattern (white/tan ceiling tile)	ND
USPC-6A-224	12"x12" Acoustical ceiling tile, dot pattern (white/tan ceiling tile with white paint)	ND
USPC-6A-240	20"x20" Acoustical ceiling tile, smooth finish (tan ceiling tile)	ND
USPC-6A-253		ND
USPC-6A-242	2'x2' Suspended ceiling tile with rough texture (white ceiling tile with foil)	ND
USPC-6A-243		ND
USPC-6A-245	12"x12" Acoustical ceiling tile with random dots (tan ceiling tile)	ND
USPC-6A-246		ND
USPC-6A-249*	Drywall/joint compound (3 parts)	ND
USPC-6A-249 (A)	White drywall	ND
USPC-6A-249 (B)	White joint compound	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-6A-249 (C)	White tape	ND
USPC-6A-257*	Layered paper pipe insulation (3 parts)	21.0% Chrysotile
USPC-6A-257 (A)	Tan woven wrap	ND
USPC-6A-257 (B)	Tan felt	ND
USPC-6A-257 (C)	Black felt	70.0% Chrysotile
USPC-6A-258	2'x4' Suspended ceiling panels, random fissured (white)	ND
USPC-6A-259		ND
USPC-6A-260	Tar tape P.I. (black tar)	15.0% Chrysotile
USPC-6A-261	Tar tape P.I. (group method)	NA
USPC-6A-262	Tar tape P.I. (group method)	NA
USPC-6A-226*	Hard plaster (3 parts)	ND
USPC-6A-226 (A)	Off-white sand plaster	ND
USPC-6A-226 (B)	White plaster with paint	ND
USPC-6A-226 (C)	White joint compound with paint	ND
USPC-6A-248*	Hard plaster (3 parts)	ND
USPC-6A-248 (A)	Off-white sand plaster	ND
USPC-6A-248 (B)	White plaster with paint	ND
USPC-6A-248 (C)	White joint compound with paint	ND
USPC-6A-265*	Drywall/joint compound (2 parts)	ND
USPC-6A-265 (A)	White joint compound	ND
USPC-6A-265 (B)	White drywall	ND
USPC-6A-266	Preformed block pipe insulation (white fibrous insulation)	30.0% Chrysotile 10.0% Crocidolite
USPC-6A-271		NA
USPC-6A-273		NA
USPC-6A-274*	Layered paper pipe insulation (3 parts)	16.0% Chrysotile
USPC-6A-274 (A)	Tan felt	20.0% Chrysotile
USPC-6A-274 (B)	White woven wrap	ND
USPC-6A-274 (C)	Black felt	ND
USPC-6A-264*	Hard plaster (2 parts)	ND
USPC-6A-264 (A)	Off-white sand plaster	ND
USPC-6A-264 (B)	White plaster with paint	ND
USPC-6A-267*	Hard plaster (2 parts)	ND
USPC-6A-267 (A)	White plaster with paint	ND
USPC-6A-267 (B)	White joint compound with paint	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-6A-269*	Hard plaster (2 parts)	ND
USPC-6A-269 (A)	Off-white sand plaster	ND
USPC-6A-269 (B)	White plaster with paint	ND
USPC-6A-272*	Hard plaster (2 parts)	ND
USPC-6A-272 (A)	Off-white sand plaster	ND
USPC-6A-272 (B)	White plaster with paint/white joint compound with paint	ND
USPC-6A-275*	Hard plaster (2 parts)	ND
USPC-6A-275 (A)	Off-white sand plaster	ND
USPC-6A-275 (B)	White sand plaster	ND
USPC-6A-276*	LPPI (3 parts)	21.3% Chrysotile
USPC-6A-276 (A)	Tan felt	25.0% Chrysotile
USPC-6A-276 (B)	White woven wrap	ND
USPC-6A-276 (C)	Black felt	ND
USPC-6A-279	Fitting on FG line (gray fibrous ins.)	ND
USPC-6A-280		ND
USPC-6A-230	Aircell P.I. (white, with paint)	75.0% Chrysotile
USPC-6A-268		NA
USPC-6A-278		NA
USPC-6A-231	Radiator lining (white felt with inseparable tan mastic)	40.0% Chrysotile
USPC-6A-232	Radiator lining (group method)	NA
USPC-6A-233		NA
USPC-6A-277	Transite radiator lining (gray)	35.0% Chrysotile
USPC-6A-434	Window glazing (reddish brown)	ND
USPC-6A-436		ND
USPC-6A-435	Window caulking (brown)	12.0% Chrysotile
USPC-6A-437		NA
BUILDING #7		
USPC-7-281*	9"x9" Floor tile, green (2 parts)	30.2% Chrysotile
USPC-7-281 (A)	Green floor tile	30.0% Chrysotile
USPC-7-281 (B)	Black mastic	40.0% Chrysotile
USPC-7-301	9"x9" Floor tile, green (group method)	NA
USPC-7-292*	9"x9" Floor tile, beige (2 parts)	20.3% Chrysotile
USPC-7-292 (A)	Off-white floor tile	20.0% Chrysotile
USPC-7-292 (B)	Black mastic	30.0% Chrysotile



**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-7-293	9"x9" Floor tile, beige (group method)	NA
USPC-7-308*	12"x12" Floor tile, white with gold blotches (2 parts)	11.0% Chrysotile
USPC-7-308 (A)	Grayish white marble floor tile	12.0% Chrysotile
USPC-7-308 (B)	Yellow mastic	ND
USPC-7-309*	12"x12" Floor tile, white with gold blotches (2 parts)	11.9% Chrysotile
USPC-7-309 (A)	Grayish white marble floor tile	12.0% Chrysotile
USPC-7-309 (B)	Yellow mastic	ND
USPC-7-311*	Linoleum floor covering, white pebble pattern (2 parts)	32.2% Chrysotile
USPC-7-311 (A)	White pebble linoleum	35.0% Chrysotile
USPC-7-311 (B)	Tan mastic	ND
USPC-7-312*	Linoleum floor covering, white marble pattern (2 parts)	29.8% Chrysotile
USPC-7-312 (A)	White pebble linoleum	35.0% Chrysotile
USPC-7-312 (B)	Tan mastic	ND
USPC-7-335*	9"x9" Floor tile, green with black and white streaks (2 parts)	40.5% Chrysotile
USPC-7-335 (A)	Green floor tile	45.5% Chrysotile
USPC-7-335 (B)	Black mastic	ND
USPC-7-322*	9"x9" Floor tile, green with black and white streaks (2 parts)	36.0% Chrysotile
USPC-7-322 (A)	Green floor tile	ND
USPC-7-322 (B)	Black mastic	ND
USPC-7-318*	12"x12" Floor tile, gold and black speckled (2 parts)	14.6% Chrysotile
USPC-7-318 (A)	Brownish yellow floor tile	15.0% Chrysotile
USPC-7-318 (B)	Yellow mastic with black mastic	ND
USPC-7-319*	12"x12" Floor tile, gold and black speckled (2 parts)	14.7% Chrysotile
USPC-7-319 (A)	Brownish yellow floor tile	15.0% Chrysotile
USPC-7-319 (B)	Yellow mastic with black mastic	ND
USPC-7-351*	9"x9" Floor tile, white with black streaks (2 parts)	9.2% Chrysotile
USPC-7-351 (A)	White/gold sparkle floor tile	10.0% Chrysotile
USPC-7-351 (B)	Black mastic with paint	ND
USPC-7-352*	9"x9" Floor tile, white with black streaks (2 parts)	9.2% Chrysotile

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-7-352 (A)	White/gold sparkle floor tile	10.0% Chrysotile
USPC-7-352 (B)	Black mastic with paint	ND
USPC-7-314	12"x12" Acoustical ceiling tile, slot pattern (tan/white)	ND
USPC-7-339		ND
USPC-7-321	2'x4' Suspended ceiling panels, random fissures (white/gray)	ND
USPC-7-324	12"x12" Acoustical ceiling tile, deep fissures (white)	ND
USPC-7-326		ND
USPC-7-327	12"x12" Acoustical ceiling panels, lateral fissures (white/gray)	ND
USPC-7-328		ND
USPC-7-341	2'x4' Suspended ceiling panels, random fissures (white/gray)	ND
USPC-7-283	2'x4' Suspended ceiling tile, lateral fissure (white)	ND
USPC-7-336		ND
USPC-7-302	12"x12" Acoustical ceiling tile, dot pattern (tan/white)	ND
USPC-7-303		ND
USPC-7-285	Layered paper pipe insulation (LPPI) (tan/white insulation with painted wrap)	5.0% Chrysotile
USPC-7-295		NA
USPC-7-305		NA
USPC-7-286	Preformed block pipe insulation (PFBPI) white insulation with brown painted wrap)	20.0% Chrysotile
USPC-7-296		NA
USPC-7-317		NA
USPC-7-289	Fittings on fiberglass line	ND
USPC-7-290		ND
USPC-7-349		ND
USPC-7-306	Aircell P.I. (group method)	NA
USPC-7-284		70.0% Chrysotile
USPC-7-384		NA
USPC-7-297	Tar wrap pipe insulation. (black)	20.0% Chrysotile
USPC-7-298		NA
USPC-7-299		NA

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-7-300	Hard plaster (gray sand plaster with paint)	ND
USPC-7-307		ND
USPC-7-315*	Hard plaster (2 parts)	ND
USPC-7-315 (A)	Off-white sand plaster	ND
USPC-7-315 (B)	White plaster with paint	ND
USPC-7-350	Hard plaster (off-white sand plaster)	Tr <1.0% Chrysotile
USPC-7-316	Mastic on ACT (hockey pucks) (brown)	ND
USPC-7-330		ND
USPC-7-332*	Radiator heat shield (2 parts)	ND
USPC-7-332 (A)	Foil/plastic cover	ND
USPC-7-332 (B)	White woven material	ND
USPC-7-333*	Radiator heat shield (2 parts)	ND
USPC-7-333 (A)	Foil/plastic cover	ND
USPC-7-333 (B)	White woven material	ND
USPC-7-334*	Radiator heat shield (2 parts)	ND
USPC-7-334 (A)	Foil/plastic cover	ND
USPC-7-334 (B)	White woven material	ND
USPC-7-287	Hard plaster (off-white sand plaster)	ND
USPC-7-288		Tr (<1.0% Chrysotile
USPC-7-291		ND
USPC-7-338*	Drywall/joint compound	Trace <1% (Confirmed by point count analysis )
USPC-7-338 (A)	White/tan drywall	ND
USPC-7-338 (B)	Tannish white joint compound	8.0% Chrysotile
USPC-7-338 (C)	White tape	ND
USPC-7-338 (D)	White joint compound with paint	2.0% Chrysotile
USPC-7-343	Aircell duct (white, with painted wrap)	65.0% Chrysotile
USPC-7-344*	Drywall/joint compound (3 parts)	ND
USPC-7-344 (A)	White/tan drywall	ND
USPC-7-344 (B)	White joint compound with paint (2 layers)	ND
USPC-7-344 (C)	White tape	ND
USPC-7-346	Aircell duct (group method)	NA
USPC-7-347	Aircell duct (group method)	NA
USPC-7-348*	Insulation (2 parts)	47.5% Chrysotile

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-7-348 (A)	White aircell insulation	75.0% Chrysotile
USPC-7-348 (B)	White fibrous insulation with textured paint	20.0% Chrysotile
USPC-7-447	Window caulking (white elastic with metal) (metal not analyzed)	-
USPC-7-451		15.0% Chrysotile
USPC-7-448	Window glazing (rust brown)	ND
USPC-7-450		ND
BUILDING #8		
USPC-8-59	Aircell pipe insulation (gray)	85.0% Chrysotile
USPC-8-464	Window caulking (brown)	8.0% Chrysotile
USPC-8-466		NA
USPC-8-463	Window glazing (off-white)	Tr <1.0% Chrysotile
USPC-8-465		NA
BUILDING #9		
USPC-9-8	Preformed block tank insulation., tank #1 (white)	65.0% Chrysotile
USPC-9-9		NA
USPC-9-10		NA
USPC-9-11	Preformed block tank insulation tank ins., tank #2 (grayish white/white)	55.0% Chrysotile
USPC-9-12		NA
USPC-9-13		NA
USPC-9-14	Preformed block pipe insulation on large steam line (white/gray insulation)	30.0% Chrysotile
USPC-9-15		NA
USPC-9-16		NA
USPC-9-17	Fitting on fiberglass line (white insulation)	ND
USPC-9-18		ND
USPC-9-19	Preformed block pipe insulation on small steam lines (white insulation)	35.0% Chrysotile
USPC-9-20		NA
USPC-9-21		NA
USPC-9-22	Layered paper pipe insulation on water lines (tan insulation)	10.0% Chrysotile
USPC-9-23		NA

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

<b>I.D.</b>	<b>SAMPLED MATERIAL</b>	<b>% ASBESTOS</b>
USPC-9-24		NA
USPC-9-25	Transite panel (gray/white)	40.0% Chrysotile
USPC-9-26	Preformed block insulation on electrical line (grayish white insulation)	85.0% Chrysotile
USPC-9-27		NA
USPC-9-28		NA
USPC-9-29	Preformed block tank insulation, tank #3 (gray)	75% Chrysotile
USPC-9-30		NA
USPC-9-31		NA
USPC-9-32	Preformed block on boiler outside exhaust (white insulation)	25.0% Chrysotile
USPC-9-33		NA
USPC-9-34		NA
USPC-9-35	Caulk on boiler (between I-beam and boiler (gray ins. with silver paint)	10.0% Chrysotile
USPC-9-36		NA
USPC-9-37		NA
USPC-9-38	Preformed brick on boiler doors (white insulation)	40.0% Chrysotile
USPC-9-39		NA
USPC-9-40		NA
USPC-9-41	Caulk between boiler tubes (tannish gray insulation)	85.0% Chrysotile
USPC-9-42		NA
USPC-9-43		NA
USPC-9-44	Preformed block on boiler exhaust (inside) (grayish white ins.)	45.0% Chrysotile
USPC-9-45		NA
USPC-9-46		NA
USPC-9-47	Boiler door gasket (gray woven)	80.0% Chrysotile
USPC-9-48		NA
USPC-9-49		NA
USPC-9-50	Preformed block insulation on boiler tanks (white insulation)	35.0% Chrysotile
USPC-9-51		NA
USPC-9-52		NA

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-9-53	Preformed block tank insulation, tank #4 (white)	35.0% Chrysotile
USPC-9-54		NA
USPC-9-55		NA
USPC-9-56	Preformed block tank insulation, tank #5 (gray)	85.0% Chrysotile
USPC-9-57		NA
USPC-9-58		NA
USPC-9-458	Window caulking (yellowish tan)	20.0% Chrysotile
USPC-9-460		NA
USPC-9-457	Window glazing (gray)	Tr <1.0% Chrysotile
USPC-9-459		ND
BUILDING #10		
USPC-10-1	2'x4' Suspended ceiling panel long random fissure (CT-1) (white)	ND
USPC-10-2		ND
USPC-10-3	2'x4' Suspended ceiling panel small deep random fissure (CT-2) (white)	ND
USPC-10-4		ND
USPC-10-5	2'x4' Suspended ceiling panel smooth finish (CT-3) (white/brown)	ND
USPC-10-6		ND
USPC-10-7	Aircell pipe insulation. (gray)	85.0% Chrysotile
USPC-10-452	Window glazing (off-white)	Tr <1.0% Chrysotile
USPC-10-454		Tr <1.0% Chrysotile
USPC-10-453	Window caulking (brown)	30.0% Chrysotile
USPC-10-455		NA
BUILDING #13		
USPC-13-470	Window caulking (beige)	10.0% Chrysotile
USPC-13-472		NA
USPC-13-469	Window glazing (gray)	Tr <1.0% Chrysotile
USPC-13-471		ND
BUILDING #16		
USPC-15-60*	Aircell pipe insulation (2 parts)	ND
USPC-15-60 (A)	Tan paper insulation	ND
USPC-15-60 (B)	Black felt	ND

**Table 1. BULK SAMPLE ANALYTICAL RESULTS  
U.S. PLAYING CARD**

I.D.	SAMPLED MATERIAL	% ASBESTOS
USPC-15-61*	Aircell pipe insulation (3 parts)	7.7% Chrysotile
USPC-15-61 (A)	White paper insulation	85.0% Chrysotile
USPC-15-61 (B)	Tan paper insulation	ND
USPC-15-61 (C)	Black felt	ND
USPC-15-62*	Aircell pipe insulation (2 parts)	ND
USPC-15-62 (A)	Tan paper insulation	ND
USPC-15-62 (B)	Black felt	ND
USPC-15-63	Rolled-in insulation (gray)	ND
USPC-15-64		ND
USPC-15-65		ND
USPC-15-66	Drywall joint compound (no apparent JC)	ND
USPC-15-67		ND
BUILDING #18		
USPC-18-475	Window glazing (gray)	Tr <1.0% Chrysotile
USPC-18-477		Tr <1.0% Chrysotile
USPC-18-481		Tr <1.0% Chrysotile
USPC-18-482		ND
USPC-18-476	Window caulking (tannish white)	10.0% Chrysotile
USPC-18-478		NA

\* – Composite analysis (multilayered sample)

NA – Not analyzed

ND – None detected

Table 2 ACM Inventory USPC

## BUILDING 1

FLOOR	ROOM	TSI (in linear feet)		Cementous Fittings on Fiberglass (per count)		Window Caulk (in square feet)		Roofing (in square feet)	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
Basement	All					80	G-SD		
Basement	36	525	G-SD						
Basement	40(tunnels)	820	G						
First	All					2000	G-SD		
First	1			5	G				
First	2	125	G-D	25	G				
First	4	15	D	16	G				
First	42			1	G				
Second	All					2000	G-SD		
Second	5	110	G	2	G				
Second	6	20	D						
Third	18	230	G	20	G				
Third	19	10	G						
Third	20	15	G						
Fourth	25	155	G	65	G-SD				
Fourth	All					950	G-SD		
Roofing	Assumed							43200	G
Total		2025		134		5030		43200	



BUILDING 2

FLOOR	ROOM	TSI		Radiator Heat Shield		Window Glaze/Caulk		Resilient Floor Covering		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
Basement	All					200	D-SD				
First	All					21608	G-P				
First	41	170	G-D								
First	43	90	G-D								
First	45	50	G								
First	50							616	G		
First	51							128	G		
First	52							252	G		
First	53							168	G		
First	54							140	G		
First	55							140	G		
First	56							72	G		
First	62										
Second	All							24072	G-SD		
Second	18			70	G						
Second	25	10	G								
Second	27	10	G					2000	G		
Second	28							100	G		
Second	29							100	G		
Second	30							100	G		
Second	31							100	G		
Second	32			100	G			300	G		
Second	33							300	G		
Second	34							300	G		
Second	35							300	G		
Second	36							300	G		
Second	38	20	G								
Second	39	20	G								
Second	40	50	G								
Third	All							2376	G		
Third	9	35	G								
Third	10	100	G								
Third	11	55	G								
Third	12	70	G								
Third	13	10	G								
Fourth	All							10468	G		
Fourth	1	130	G								
Fourth	2	105	G								
Fourth	3	260	G								
Fourth	5	10	G								
Fourth	7	30	G								
Fourth	8	30	G								
Roofing	Assumed									10800	G
Totals		1255		170		21808		42332		10800	

**BUILDING 3**

FLOOR	ROOM	TSI		Window Caulk		Resilient Floor Covering		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
First	All			1440	D-SD				
First	43	45	G						
First	46	20	G						
First	48					400	G		
First	65	75	G						
First	66	110	G						
First	67	105	G						
First	68	15	G						
Second	All			1632	D-SD				
Second	28					675			
Second	40	10	G						
Second	42	5	G						
Second	63	40	G						
Third	All			1536	D-SD				
Third	15	255	G						
Third	17	20	G						
Third	56&57	10	D						
Third	58&59	60	D						
Fourth	All			1584	D-SD				
Fourth	1	540	G						
Fourth	2	12	G						
Fourth	3	115	G						
Fourth	52	5	G						
Fourth	54	20	G						
Roofing	Assumed							16200	G
Total		1462		6192		1075		16200	

BUILDING 4

FLOOR	ROOM	TSI		Window Caulk		Resilient Floor Covering		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
First	All			1104	D-SD				
First	10	445	G						
First	11					250	D		
Second	All			1584	D-SD				
Second	7	10	D						
Second	9	25	G						
Second	14					288	G		
Second	15	10	G			225	G		
Second	16					30	G		
Second	17					160	G		
Second	18					50	G		
Third	All			1752	D-SD				
Third	4	295	G						
Third	6	90	G						
Fourth	All			1608	D-SD				
Fourth	1	1290	G						
Fourth	2	30	G						
Fourth	3	240	G						
Roofing	Assumed							16200	G
Total		2435		6048		1003		16200	

**BUILDING 5**

FLOOR	ROOM	TSI		Roofing	
		Quantity	Condition	Quantity	Condition
First	1	50	G		
First	2	175	G		
Roofing	Assumed			16200	G
<b>Totals</b>		<b>225</b>		<b>16200</b>	

**BUILDING 6**

FLOOR	ROOM	TSI		Window Caulk		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition
First	All			208	G		
First	1	125	G				
First	2	120	G				
First	3	125	G				
First	4	10	G				
Second	6	135	G				
Second	7	120	G				
Second	8	120	G				
Second	All			208	G		
Roofing	Assumed					15600	G
<b>Total</b>		<b>755</b>		<b>416</b>		<b>15600</b>	

BUILDING 6A

FLOOR	ROOM	TSI		Radiator Heat Shield/Lining		Window Caulk		Resilient Floor Covering		Roofing		Tar Tape Pipe Insulation		Transite Radiator Lining	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
First	All					696	G-SD								
First	44	10	G	10	G										
First	45	15	G					480	G						
First	46	30	G												
First	47							800	G						
First	48	20	G									20	G		
First	49	55	G												
First	56	15	G												
First	59	15	G												
First	65							375	G					20	G
Second	All					864	G-SD								
Second	22			5	G										
Second	23			5	G										
Second	26							144	G						
Second	27							144	G						
Second	28							144	G						
Second	29							144	G						
Second	30							144	G						
Second	31	30	G	15	G			400	G						
Second	32			45	G			396	G						
Second	33							64	G						
Second	34			15	G			168	G						
Second	35	10	G	15	G			224	G						
Second	36			10	G			168	G						
Second	37			20	G			252	G						
Second	38	25	G	15	G			224	G						
Second	39							180	G						
Second	40							168	G						
Second	41							1440	G						
Third	All					864	G-SD								
Third	4	90	G												
Third	5	85	G												
Third	6	50	G					240	G						
Third	8							240	G						
Third	9	10	G					96	G						
Third	10			45	G										
Third	11	10	G												
Third	12							300	G						
Third	15	10	G												
Third	16	15	G												
Third	17	10	G												
Third	18	25	G												
Third	19	25	G												
Third	20	25	G												
Fourth	All					864	G								
Fourth	1	740	G												
Fourth	2	15	G												
Roofing	Assumed									7200	G				
Total		1335		200		3288		6935		7200		20		20	

BUILDING 7

FLOOR	ROOM	TSI		Radiator Heat Shield/Lining		Window Caulk		Resilient Floor Covering		Tar Tape Pipe Insulation		Aircell Duct Insulation	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
Basement	All					1750	G-SD						
Basement		1	3825 G					1125	G				
Basement		2	10 G										
Basement		3	140 G										
Basement		4						120	G				
Basement		6	120 G										
Basement		9	10 G										
First	All					1500	G-SD						
First		12	15 D										
First		15	80 D										
First		16	5 D										
First		29						100	G				
First		33	10 G									500	G
First		34	10 G										
First		36	15 G									200	G
First		37						140	G				
First		38						100	G				
First		39						30	G				
First		40						144	G				
First		41						75	G				
First		42						450	G				
First		43						180	G				
First		44						120	G				
First		45	10 G		80 G			240	G				
First		46	10 G		20 G			150	G				
First		47	30 G		20 G			180	G				
First		48			20 G			180	G				
First		49	20 G		40 G			324	G				
First		50						240	G				
First		51						360	G				
First		52						140	G				
First		53						140	G				
First		54						168	G				
First		55						168	G				
First		56						140	G				
First		57						112	G				
First		58						168	G				
First		59						275	G				
First		60						5600	G			150	G
First		61						700	G			560	G
First		63	10 G										
First		74	20 G										
First		75	20 G										
First		76										200	G
Second	All					900	G-SD						
Second		26	50 G										
Second		27	45 G										
Second		28	25 G										
Second		68						3200	G				
Second		69	20 G										
Third	All					750	G						
Third		20	35 G					2000	D	35	G		
Third		21	15 G										
Third		22	10 D										
Fourth	All					750	G						
Total		4560		180		5650		17069		35		1610	

**BUILDING 8**

FLOOR	ROOM	TSI		Window Caulk		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition
First	1	500	SD				
First	2	200	D				
First	All			1600	G-SD		
Roofing	Assumed					13500	SD
<b>Total</b>		<b>700</b>		<b>1600</b>		<b>13500</b>	



**BUILDING 9**

FLOOR	ROOM	TSI		PFI on Electrical Lines		Tank Insulation		Window Caulk		Preformed Block Insulation on Boiler Exhaust		Preformed Brick on Boilers		Caulk on Boiler		Roofing		Transite	
		Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition	Quantity	Condition
First		1	65 G																
First		2	845 G-SD			3361 G												35 G	
First		3	775 G-SD			4800 D				720 SD		800 SD		1290 D					
Basement		4	600 D-SD		80 G	1210 D-SD													
Outside	South									2000 G									
All	All							1518 G-SD											
Roofing	Assumed															12000 G			
Total			2285		80	9371		1518		2720		800		1290		12000		35	

**BUILDING 10**

FLOOR	ROOM	TSI		Window Caulk		Roofing	
		Quantity	Condition	Quantity	Condition	Quantity	Condition
First	1	25	G				
First	3	40	G				
First	5	10	G				
All	All			1496	G-SD		
Roofing	Asssumed					12500	G
<b>Total</b>		75		1496		12500	

**BUILDING 13**

FLOOR	ROOM	Window Caulk		Roofing	
		Quantity	Condition	Quantity	Condition
All	All	192	G-SD		
All	Assumed			375	G
<b>Total</b>		192		375	

**BUILDING 15**

FLOOR	ROOM	TSI		Window Caulk	
		Quantity	Condition	Quantity	Condition
First	1	47	D-SD		
All	All			182	G-SD
<b>Total</b>		<b>47</b>		<b>182</b>	